



Final Regulation Agency Background Document

Agency name	Board (Department) of Education
Virginia Administrative Code (VAC) citation	8 VAC 20-131
Regulation title	Regulations Establishing Standards for Accrediting Public Schools in Virginia
Action title	Amendments to the Standards of Accreditation
Date this document prepared	February 20, 2009

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 36 (2006) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.

Section 22.1-253.13:3 of the *Code of Virginia* requires the Board of Education to promulgate Standards of Accreditation for Virginia's K-12 public schools. The current regulations were adopted by the Board of Education on May 24, 2006, and became effective September 7, 2006. In July 2006, the president of the Board, Dr. Mark Emblidge, formed a special committee of the Board of Education to research and recommend policies to reduce the number of students who drop out of high school and to improve graduation rates, especially among minority students. The proposed revisions are an outgrowth of the work both of that committee and of the Board's adoption of a graduation rate formula in November 2006: Graduation rate = [On-time graduates in Year X] / [(First-time entering ninth graders in Year X-4) + (Transfers in) - (Transfers out)]. In the fall of 2008, the records of first-time ninth graders in 2004-2005 will be able to be linked to their records four years later to determine their graduation status.

The proposed revisions are also in response to legislation passed by the 2007 General Assembly that requires the Board of Education to establish the requirements for the Standard Technical and Advanced Technical Diplomas. HB 2039 and SB 1147 require the Board to:

Establish the requirements for a technical diploma. This diploma shall meet or exceed the requirements of a standard diploma and will include a concentration in career and technical education, as established in Board regulations. A student who meets the requirement for the advanced studies diploma who also fulfills a concentration in career and technical education shall receive an advanced technical diploma. The Board may develop or designate assessments in career and technical education for the purposes of awarding verified credit pursuant to subdivision 6....

In addition, in 2007, the House Education Committee, while not taking action on HB 3201, related to removing students from classes, requested the Chairman write a letter to the Board of Education asking that the Board consider this issue in its review of applicable regulations, and report back to the patron and the committee. Language in response to this bill is included in the proposed revisions.

In a letter to the Board President dated December 20, 2007, Governor Kaine requested that the Board consider including the requirement for an academic and career plan for all students, beginning in the middle school years.

During the public comment period, September 1 through November 5, 2008, the Board received 475 comments. Most of the comments addressed either economics and financial literacy or graduation and dropout prevention, including the Graduation and Completion Index. Following the public comment period, the Board received several requests to delay implementation of any additional requirements in the proposed regulations because of the budget situation. A summary of the public comments is attached.

Finally, there are three bills before the 2009 General Assembly that relate to these regulations:

- HB 2166 (Lohr) would delay until July 1, 2010, any additional requirements related to school accreditation and graduation requirements.
- HB 2619 (Barlow) addresses transfer provisions for course credits earned for the Department of Education’s online program, Virtual Virginia.
- HB 2552 (Crockett-Stark) would add to the requirements for earning a diploma a standard credit in economics and personal finance, beginning with the first-time ninth-grade class of 2010-2011. Although Delegate Crockett-Stark strongly supports requiring a standard credit in economics and personal finance, in deference to the Board and recognizing that this issue would come before the Board this month, she asked that the bill be passed by with a letter to the Board of Education requesting that the Board consider establishing such a requirement.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.

During the February 19, 2009 meeting of the Board of Education, the Board adopted the proposed revisions to the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* 8VAC 20-131-10 et seq., and directed the Department of Education to proceed with the final stages of the administrative process.

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter numbers, if applicable, and (2) promulgating entity, i.e., agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.

Section 22.1-19 of the *Code of Virginia* requires that the Board of Education "... provide for the accreditation of public elementary, middle, and high schools in accordance with standards prescribed by it." Further, the Standards of Quality for Public Schools in Virginia (SOQ), in § 22.1-253.13:3.F of the *Code of Virginia*, requires that local school boards "... maintain schools which meet the standards of accreditation prescribed by the Board of Education." The current standards were final in September 2006. This action by the Board of Education is mandatory.

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

This action is essential to protect the health, safety, and welfare of the Commonwealth's most vulnerable citizens—its school-age population. The goals of the proposal are to strengthen the quality of instruction in public schools in Virginia and to bring the standards into conformity with amended or new state laws. These regulations form the basis for the day-to-day operation of the educational program in each public school in Virginia. The regulations contain provisions to govern student achievement expectations; requirements for graduation; transfer students; college and career preparation programs and opportunities for postsecondary credit; role of the school principal; school and community communications; school accountability; procedures for certifying school accountability, application of the standards; and recognition and rewards for school and division accountability performance.

Substance

Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.

There are a number of substantive changes to the regulations, most notably in 8 VAC 20-131-50 creating the Standard Technical and Advanced Technical diplomas as required by General Assembly action. Other substantive changes are found in 8 VAC 20-131-140 where an Academic and Career Plan for students beginning in grade seven is proposed at the Governor's request. Changes have been proposed in 8 VAC 20-131-300 to establish a graduation and completion index that all schools with a graduating class would be required to meet in order to be fully accredited.

Issues

Please identify the issues associated with the proposed regulatory action, including:

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and*
- 3) other pertinent matters of interest to the regulated community, government officials, and the public.*

If there are no disadvantages to the public or the Commonwealth, please indicate.

The revisions to the regulations creating the requirements for a Standard Technical Diploma and an Advanced Technical Diploma will be advantageous to the business community. Graduates with the new technical diplomas

will provide employers evidence that they are skilled, educated and prepared to enter into the workforce at a time when the number of retirement age employees in the workforce is creating a strain on employers to find skilled employees. The creation of graduation and completion index will be advantageous to the public and business community by providing further accountability for the public schools to ensure that schools are making the necessary efforts to prevent dropouts, to retain students, and to graduate students with appropriate credentials that have prepared students to transition into postsecondary instruction and/or the workforce.

Changes made since the proposed stage

Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar’s office, please put an asterisk next to any substantive changes.

Section number	Requirement at proposed stage	What has changed	Rationale for change
20-131-05	Proposed language adds the two new diplomas, Standard Technical and Advanced Technical, to the list of diplomas included in the definition of graduate.	No changes	N/A
20-131-30	Proposed language clarifies that students shall be required to take only one test per content area in each tested grade. This language is proposed to eliminate any double testing of advanced students in content areas and to reduce the testing costs to the state associated with double testing.	The language was amended slightly for better clarity.	Changes are designed to strengthen the Board’s position regarding double testing based on public comment.
20-131-50	<ul style="list-style-type: none"> Language is amended to make the new requirements affective with the ninth grade classes of 2009-2010. For the Standard Diploma the number of required elective standard units of credit is reduced from six to five so that one standard unit of credit in foreign language, economics, or personal finance is added to the diploma’s requirements. <p>Language is added to the list of courses in the footnotes to satisfy the mathematics requirements for the Standard Diploma to include Algebra, Functions, and Data Analysis, in addition to Algebra I, Geometry, Algebra II, or other mathematics courses above the level of Algebra II.</p> <p>Language is added in the footnotes regarding the student selected test required for the Standard and Advanced Studies</p>	<ul style="list-style-type: none"> New language makes the requirements effective with the ninth-grade class of 2010-2011. One credit in economics and personal finance would be required for the Standard, Standard Technical, Advanced Studies, and Advanced Technical Diplomas. The original language provided for economics or personal finance. Foreign language was added to the Standard Diploma option of two standard credits in fine arts or career and technical education. Language was added to the Standard Diploma footnotes regarding the sequence of science courses. Footnote seven was added to 	<ul style="list-style-type: none"> The delayed effective date recognizes that additional planning time is needed and the challenges of the current economic environment. Changes to the economics and personal finance provisions were in response to public comment and actions by the 2009 General Assembly. The option of receiving standard credits for foreign language, fine arts or career and

	<p>Diplomas to now include an assessment prescribed by the Board in economics.</p> <p>The requirements for the Advanced Studies Diploma would be revised to require two additional standard credits: one in economics or personal finance, and one additional elective. The total number of standard credits required for the Advanced Studies Diploma would be 26, consistent with the number required for the Advanced Technical Diploma.</p> <p>Standard Technical Diploma requirements are added as required by General Assembly action. The diploma requires a minimum of 22 standard credits and six verified credits, in the following areas:</p> <ul style="list-style-type: none"> • English – Four standard credits and two verified credits • Mathematics – Three standard credits and one verified credit <p>Courses completed to satisfy this requirement would include at least three course selections from among: Algebra I, Geometry, Algebra Functions and Data Analysis, Algebra II, or other mathematics courses above the level of Algebra II. The Board would approve courses to satisfy this requirement.</p> <ul style="list-style-type: none"> • Laboratory science – Three standard credits and one verified credit. Courses completed to satisfy this requirement would include course selections from at least three different science disciplines from among: earth sciences, biology, chemistry, or physics, or completion of the sequence of science courses required for the International Baccalaureate Diploma. The Board would approve courses to satisfy this requirement. • History and social sciences – Three standard credits and one verified credit <p>Courses completed to satisfy this requirement would include U.S. and Virginia History, U.S. and Virginia Government, and one course in either world history or geography or both. The Board would approve courses to satisfy this requirement.</p> <ul style="list-style-type: none"> • Health and physical education – Two standard credits • Fine arts, foreign language, economics, or personal finance – One standard credit • Career and Technical Education – Four 	<p>the Standard Diploma.</p> <ul style="list-style-type: none"> • Other changes were made to footnotes to make them consistent. • In the Standard Technical Diploma the number of electives was reduced from two to one to provide for one credit in economics and personal finance while maintaining a requirement for one credit in fine arts or foreign language. • In the Advanced Technical Diploma the requirement for one credit in fine arts, economics, or career and technical education and one credit in personal finance was changed to one credit in fine arts or career and technical education and one credit in economics and personal finance. • Language regarding eligibility was added to the footnotes requiring career concentration assessments. • The term “probability” was added to the footnotes for the Modified Standard Diploma to correct the title of the statistics and probability course. 	<p>technical education was added to the Standard Diploma to give students more flexibility and choices while meeting the demands of public comment to provide one credit in economics and personal finance.</p> <ul style="list-style-type: none"> • The language added to the Standard Diploma footnotes regarding the sequence of science courses was inserted to make the language consistent with the other Diploma requirements. • Footnote seven was added to the Standard Diploma to ensure compliance with the Code of Virginia. • Changes made to the technical diplomas were done to meet the demands of public comment to provide one credit in economics and personal finance. • Language regarding eligibility was added to the footnotes requiring career concentration
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<p>standard credits. Courses completed to satisfy this requirement must include a career concentration as approved by the Board. For concentrations that require less than four courses students must complete additional courses that are related to the student’s career concentration.</p> <ul style="list-style-type: none"> • Electives – Two standard credits • Student selected assessment – One verified credit. A student may utilize additional tests for earning verified credit in computer science, technology, career and technical education, economics or other areas as prescribed by the Board in 8 VAC 20-131-110. If a career concentration includes a specific assessment approved by the Board, then the student must take this assessment. • Students who complete a career and technical education program sequence and pass an examination or occupational competency assessment in a career and technical education field that confers certification or an occupational competency credential from a recognized industry or trade or professional association or acquires a professional license in a career and technical education field from the Commonwealth of Virginia may substitute the certification competency credential or license for (i) the student selected verified credit and (ii) either a science or history and social science verified credit when the certification license or credential confers more than one verified credit. The examination or occupational competency assessment must be approved by the Board as an additional test to verify student achievement. <p>Advanced Technical Diploma requirements are added as required by General Assembly action. The diploma requires a minimum of 26 standard credits and nine verified credits, in the following areas:</p> <ul style="list-style-type: none"> • English – Four standard credits and two verified credits • Mathematics – Four standard credits and two verified credits. Courses completed to satisfy this requirement would include at least three course selections from among: Algebra I, Geometry, Algebra II, or other mathematics courses above the 		<p>assessments to ensure that only students who meet eligibility criteria will be required to take the assessments. Many of the assessments have a minimum age requirement that some students who take the concentration may not meet.</p>
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<p>level of Algebra II. The Board would approve courses to satisfy this requirement.</p> <ul style="list-style-type: none"> • Laboratory science – Four standard credits and two verified credits. Courses completed to satisfy this requirement would include course selections from at least three different science disciplines from among: earth sciences, biology, chemistry, or physics, or completion of the sequence of science courses required for the International Baccalaureate Diploma. The Board would approve courses to satisfy this requirement. • History and social sciences – Four standard credits and two verified credits. Courses completed to satisfy this requirement would include U.S. and Virginia History, U.S. and Virginia Government, and one course in either world history or geography or both. The Board would approve courses to satisfy this requirement. • Foreign Language – Three standard credits Courses completed to satisfy this requirement would include three years of one language or two years of two languages. • Health and physical education – Two standard credits • Fine arts or economics – One standard credit • Career and Technical Education – Four standard credits. Courses completed to satisfy this requirement must include a career concentration as approved by the Board. For concentrations that require less than four courses students must complete additional courses that are related to the student’s career concentration. If a career concentration includes a specific assessment approved by the Board, then the student must take this assessment. • Student selected assessment – One verified credit. A student may utilize additional tests for earning verified credit in computer science, technology, career and technical education, economics or other areas as prescribed by the Board in 8 VAC 20-131-110. <p>Language in the diploma seals subsections is amended to add the two new diplomas, Standard Technical and Advanced</p>		
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	Technical, to the list of diplomas included in these sub sections.		
20-131-60	Proposed language adds the two new diplomas, Standard Technical and Advanced Technical, to the list of diplomas included in this section.	Language is added to require that credits earned through Virtual Virginia, the online program, would be accepted in Virginia public schools. Language is added to require that the State Testing Identifier (STI) for students who transfer into a Virginia public school from another Virginia public school shall be retained by the receiving school.	This is added due to action taken by the 2009 General Assembly. The STI language is added to insure that proper information is maintained in the state Education Information Management System (EIMS) for state and federal tracking of students.
20-131-80	This section was not included in proposed stage.	Language requiring use of a form prescribed by the Board of Education is stricken.	A prescribed form by the state is no longer needed.
20-131-100	This section was not included in proposed stage.	Minimum course offerings are changed to reduce electives from 4 to 3 and provide for economics and personal finance.	This change is needed due to the amendments to section 8 VAC 20-131-50.
20-131-140	An Academic and Career Plan for students beginning in grade seven is proposed at the Governor’s request.	<ul style="list-style-type: none"> • The Academic Career Plan would become effective with seventh graders in 2010-2011. • The development timeline is extended throughout the student’s seventh-grade year with completion required by the fall of the eighth-grade year. • The Board of Education will establish guidelines for development of the Plan. • Any personal academic and career plans prescribed by local school boards for students in grades 7-12 that are currently in effect would be approved to continue without further action by the Board. 	The delayed effective date and other changes recognize that additional planning time is needed and the challenges of the current economic environment. School divisions have been given flexibility in the timeline for development, in the content, and in the personnel used.
20-131-210	Proposed language requires the principal to notify parents when a student is removed from classes for disciplinary reasons for two or more consecutive days. In 2007, the House Education Committee, while not taking action on HB 3201, related to removing students from classes, requested the Chairman write a letter to the Board of Education asking that the	Language was added to provide for guardians as well as parents. Also language was added to clarify that the school shall have met its burden if it makes a good faith effort to provide the notice.	Public comment indicated that the language should be changed from “notify parents” to notify the parent or guardian.” This would allow schools to only have to contact one parent and not both or a

	Board consider this issue in its review of applicable regulations, and report back to the patron and the committee. Language in response to this bill is included in the proposed revisions.		guardian if a parent is not in control and charge of the child. The language regarding good faith is added for those instances where the school cannot reach the parent after attempts by phone, email, and mail.
20-131-270	Proposed language adds the two new diplomas, Standard Technical and Advanced Technical, to the list of diplomas included in this section.	Additional language regarding the school performance report card has been reviewed for clarity.	These changes are made for clarity, grammatical structure, and consistency.
20-131-280	Proposed language adds the graduation and completion index to existing language regarding accreditation of schools. This is necessary to align this regulation with new language in section 8 VAC 20-131-300.	<ul style="list-style-type: none"> • The points assigned for the certificate of completion is reduced from 60 to 25 points. • Language is added to align proposed revisions to the Board of Education’s adopted definition of graduation rate. • A section number is changed. • Language is added stating that the Board may add new tests or discontinue the use of existing tests in the Virginia Assessment Program by providing adequate notice to local school boards. 	<ul style="list-style-type: none"> • The points are reduced in response to public comment. • The graduation rate formula was adopted by the Board in November 2006. • The section number change is a correction. • The language regarding adding or discontinuing tests is inserted to provide the Board flexibility to address changes in federal testing requirements.
20-131-290	The term “six year plan” is changed to “comprehensive plan” to align the regulatory language with changes made to the statutory language in the Standards of Quality sections in the Code of Virginia.	No changes	N/A
20-131-300	Language is proposed to create the accreditation rating category of “Provisionally Accredited Graduation Rate.” This category is created to address the use of a Graduation and Completion index for the first time in the accreditation of schools. Obsolete language is removed. Proposed language creates a graduation and completion index to that all schools	<ul style="list-style-type: none"> • Language is added to include the graduation and completion index in other paragraphs within the same section. • STI language from 8 VAC 20-231-60 was added. • The percentage points for the graduation and completion index were changed from 80 to 85. • Language was added 	<ul style="list-style-type: none"> • Additional language changes were needed for consistency. • STI language was added for clarity. • The percentage points for the graduation and completion index

<p>with a graduating class would be required to meet in order to be fully accredited. This amendment is necessary to address the Board of Education’s concern and the public’s concerns regarding reducing the number of students dropping out of school and increasing the number of students graduating with an appropriate credential that will enable them to transition into postsecondary instruction or the workforce.</p> <ul style="list-style-type: none"> The graduation and completion index would include weighted percentage points for students who: <ul style="list-style-type: none"> Graduate from high school in four years or less – 100 points Graduate from high school in more than four years – 100 points Earn a GED certificate – 75 points Remain in school for more than four years – 70 points Earn a certificate of completion – 60 points The index would account for all students in the graduating class’s ninth grade cohort, plus transfers into the school and minus transfers out of the school and students who are deceased. Students who remain in school or earn a credential after their assigned cohort year would also be included in the index. Beginning with academic year 2009-2010, for accreditation ratings for 2010-2011, schools with a graduating class would be required to meet the prescribed thresholds on the Board’s graduation and completion rate index, in addition to meeting the required pass rates on the Standards of Learning assessments, in order to be fully accredited. Beginning with academic year 2009-2010, for accreditation ratings for 2010-2011, schools with a graduating class would be required to achieve a minimum of 80 percentage points on the Board of Education’s graduation and completion index, in addition to meeting the required Standards of Learning pass rates, in order to be fully accredited. A school would be rated provisionally 	<p>regarding conditionally accredited school to include Conditionally Accredited New and Conditionally Accredited Reconstituted.</p> <ul style="list-style-type: none"> Academic year numbers were changed. <table border="1" data-bbox="800 451 1166 1066"> <tr> <td>[2009-2010-2011]</td> <td>[2010-2011-2012]</td> <td>[75 80]</td> </tr> <tr> <td>[2010-2011-2012]</td> <td>[2011-2012-2013]</td> <td>[76 81]</td> </tr> <tr> <td>[2011-2012-2013]</td> <td>[2012-2013-2014]</td> <td>[77 82]</td> </tr> <tr> <td>[2012-2013-2014]</td> <td>[2013-2014-2015]</td> <td>[78 83]</td> </tr> <tr> <td>[2013-2014-2015]</td> <td>[2014-2015-2016]</td> <td>[79 84]</td> </tr> </table>	[2009-2010-2011]	[2010-2011-2012]	[75 80]	[2010-2011-2012]	[2011-2012-2013]	[76 81]	[2011-2012-2013]	[2012-2013-2014]	[77 82]	[2012-2013-2014]	[2013-2014-2015]	[78 83]	[2013-2014-2015]	[2014-2015-2016]	[79 84]	<p>were changed from 80 to 85 in response to public comment.</p> <ul style="list-style-type: none"> Language regarding Conditionally Accredited New schools and Conditionally Accredited Reconstituted schools was added so the public would be able to identify the reasons a school receives the conditionally accredited rating. Academic year numbers were changed to reflect the Board’s decision to delay the effective date of the amendments by one year.
[2009-2010-2011]	[2010-2011-2012]	[75 80]															
[2010-2011-2012]	[2011-2012-2013]	[76 81]															
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[2013-2014-2015]	[2014-2015-2016]	[79 84]															

	<p>accredited in academic years 2010-2011 through 2014-2015 if it met the required pass rates on the Standards of Learning assessments, but failed to achieve 80 percent on the graduation and completion index, but met the following benchmarks:</p> <table border="1" data-bbox="318 422 769 1010"> <thead> <tr> <th colspan="3">Graduation and Completion Index Benchmarks for Provisionally Accredited Ratings</th> </tr> <tr> <th>Academic Year Index</th> <th>Accreditation Year</th> <th>Percentage Points</th> </tr> </thead> <tbody> <tr> <td>2009-2010</td> <td>2010-2011</td> <td>75</td> </tr> <tr> <td>2010-2011</td> <td>2011-2012</td> <td>76</td> </tr> <tr> <td>2011-2012</td> <td>2012-2013</td> <td>77</td> </tr> <tr> <td>2012-2013</td> <td>2013-2014</td> <td>78</td> </tr> <tr> <td>2013-2014</td> <td>2014-2015</td> <td>79</td> </tr> </tbody> </table> <ul data-bbox="318 1016 769 1894" style="list-style-type: none"> • If a school failed to meet the benchmarks for the provisionally accredited rating, the school would be accredited with warning for not achieving the minimum threshold on the graduation and completion index. • If a school failed to meet the 80 percentage points on the index after accreditation year 2014-2015, the school would be accredited with warning for not achieving the minimum threshold on the index. • A school could remain in accredited with warning status for no more than three consecutive years. If the school failed to meet the minimum threshold for a fourth year, the school would be denied accreditation for not achieving the minimum threshold on the index. • Accreditation would be based on the school’s current pass rates and index points or a trailing three-year average of pass rates and index points, whichever is higher. • Alternative education schools and schools with grades with an enrollment of 50 or fewer students in the ninth grade cohort would be permitted to request that the Board 	Graduation and Completion Index Benchmarks for Provisionally Accredited Ratings			Academic Year Index	Accreditation Year	Percentage Points	2009-2010	2010-2011	75	2010-2011	2011-2012	76	2011-2012	2012-2013	77	2012-2013	2013-2014	78	2013-2014	2014-2015	79		
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	<p>approve an alternative accreditation plan to meet the graduation and completion index.</p> <ul style="list-style-type: none"> The use of the graduation and completion index for accreditation of high schools would be phased in over five years. 		
20-131-310	<p>This section was not included in proposed stage.</p>	<ul style="list-style-type: none"> The accreditation category “Provisionally Accredited Graduation Rate” was added to this section” Graduation rates were added to the provision requiring the improvement plan to address preventing further declines in student performance. 	<ul style="list-style-type: none"> “Provisionally Accredited Graduation Rate” was added to section 20-131-300 during the proposed stage. It was discovered afterwards that that change would require amending section 20-131-310 for consistency. Graduation rate language was added for consistency. The Board’s initial decision to revise the regulations was with the goal of increasing graduation rates.
20-131-325	<p>Language is added to permit school divisions to receive recognitions and rewards from the Board of Education for accountability performance. Existing language currently allows only schools to be recognized and rewarded.</p>	<p>Language was added to name the Virginia Index of Performance (VIP) incentive program.</p>	<p>The VIP program was created in guidelines as a requirement under the 2006 revisions to the regulations. The addition of the language was for the purpose of including the official name within the regulations.</p>
20-131-360	<p>The effective date of the regulations is set for the 2009-2010 academic school year.</p>	<p>Language was added to make the provisions in 8 VAC 20-131-30 B. relating to double testing and the provisions in 8 VAC 20-131-60 C. relating to Virtual Virginia effective upon final adoption in accordance with the Administrative Process Act. The remainder of these regulations</p>	<ul style="list-style-type: none"> The Board decided to delay the effective date of the regulations by one year. The delayed effective date recognizes that additional planning time is

		<p>shall be effective for the 2010-2011 academic year.</p>	<p>needed and the challenges of the current economic environment.</p> <ul style="list-style-type: none"> • The two provisions that will become effective upon final adoption are to prevent double testing or students which creates a fiscal impact on the state and greater burden on students. In guidance sent out by the Department in October of 2008, school divisions were discouraged against double testing as only one test score per subject per pupil will be counted for both state accreditation and for federal Adequate Yearly Progress (AYP). Double testing inflates true accreditation ratings for schools.
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Public comment

Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.

Commenter	Comment	Agency response
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<p>Robert Leber , Director, Education and Workforce Development Northrop Grumman Shipbuilding</p>	<p>Commenter has two areas of concern for the proposed regulations:</p> <ul style="list-style-type: none"> • Only one credit hour of "Fine Arts, Foreign Language, <u>Economics or Personal Finance</u>" is required for the Technical Diploma. • The requirement for 3 credits of a foreign language for the Advanced Technical Diploma seems excessive, while it requires only one credit hour of "Fine Arts or <u>Economics</u>." <p>Economics and finance are important educational components and unfortunately these subjects do not always get the attention they need. The proposed credit requirements do not promote the level of economic and financial literacy Virginia's students will need to thrive in our changing economy, particularly in technical careers. Students must be provided with an understanding of the basic economic principles they will need to be successful in their adult life, particularly considering that they are now in charge of their own retirement plans via 401k programs vs. the defined benefits programs of past.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance for the standard, standard technical, advanced, and advanced technical diplomas. Once credit in foreign language or fine arts is also required for the standard technical diploma.</p>
<p>Beth and Daniel Dorman</p>	<p>The current Virginia Standards of Learning require that students learn how to form the cursive letters in the third grade. However, the Standards of Learning do not require students to achieve mastery of cursive. Virginia students are unable to read cursive script and unable to provide cursive signatures. There is no longer a place on the report card to record a student's level of achievement of this important skill. The record needs to be restored to the report card and students need to master cursive writing.</p>	<p>The amendments to the Standards of Accreditation are unable to address this issue. This comment would require revisions to the Standards of Learning. Localities have the option to require students to master cursive writing any information beyond that required in the Standards of Learning.</p>
<p>Helen Rickard</p>	<p>A substitute teacher for the Prince William County schools and for Manassas City schools has been searching and applying for teacher assistant jobs for the past year with no luck. The individual was told by other staff that it is very hard to get a full-time job in the school system and it's all who you know when it comes to</p>	<p>Employment issues are within the authority of the school divisions. The amendments to the regulations are unable to address this issue.</p>

	<p>getting a full-time position. She finds this very unfair and is upset that she cannot be a teacher assistant in either school division.</p>	
<p>Cheryl A. Poe Advocating 4 Kids</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>D. Desai</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school;</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

	disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.	
Debra A. Grant	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
John A. Caggiano, Ed.D. Westside Elementary School Principal	An elementary principal (grades 4-6) in Isle of Wight County is concerned about the proposal to no longer allow students to double test in math. Many schools, in an effort to increase rigor, are pushing students to excel in mathematics. One such strategy is taking Grade 6 students with a strong foundation in basic mathematical concepts and scheduling them to take Pre-Algebra in Grade 6. While not all of these students will take Algebra in Grade 7, many of them will. If double testing is eliminated schools will be penalized for adding rigor. The principal would hate to see double testing done away with simply for financial reasons. And that unintended consequences are considered.	Double testing creates a fiscal impact on the state and greater burden on students. In guidance sent out by the Department in October of 2008, school divisions were discouraged against double testing as only one test score per subject per pupil will be counted for both state accreditation and for federal Adequate Yearly Progress (AYP). Double testing inflates true accreditation ratings for schools.
Cary Epes	Commenter strongly supports requiring that all students receive economic education to improve their personal financial management.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance
Catherine J. Rotolo	Commenter requests that the Board increase the target to at least 90 points,	The Board chose not to amend the point value for the GED and other

	<p>or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Judy Mejia</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Dee Jacobson</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and</p>

	<p>completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Dylan Rosenthal</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Melinda Whitehurst</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point</p>

	<p>schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Barbara Foster</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Parent Greenbrier Schools</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been</p>

	<p>Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Judy Lucenta</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all. In addition commenter requests the SOA provide a scientific research-based reading program that utilizes a multisensory phonetic awareness approach to all children. Commenter states that not all children are given</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>The Board did not receive further comments regarding research based reading programs.</p>

	<p>proper training to learn how to read, and teaching reading to all students will improve the graduation rate and decrease the drug abuse and crowdedness of our jails.</p>	
<p>Theresa Speight</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Trenace B. Lewis The Sound of Judah</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

	the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.	
Mary S. Howard	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Regina Craig- Parent and Daughter	Commenter states that only the Standard and Advanced Diplomas should get full credit; other options such as GEDs should be weighted according to their value to the student after high school; graduation rates must be increased for all of Virginia's most vulnerable students, including economically disadvantaged students, students with disabilities or who have limited English proficiency, and minority students.; increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Mieko Manuel Timmons	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has

	<p>for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all. Commenter supports effective and sustainable initiatives to prevent and decrease the drop out rate for school-aged children.</p>	<p>been raised from 80 points to 85 points.</p>
<p>Daniel" Seok H. Choi</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Amy Estes, Vice President Counseling Delivery ClearPoint Financial Solutions</p>	<p>Commenter requests the final regulations include requiring all students to complete an</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in</p>

	<p>Economics/Personal Finance Course prior to graduation. Commenter states that high school graduates have not been taught the importance of the wise use of credit, how to manage their budgets within their means, and more often than not, these citizens end up in financial crisis. This financial crisis not only impacts their ability to meet their financial obligations, but impacts their ability to find good paying jobs as well as retain jobs without implications that are caused by garnishments or judgments. Additionally, they pay higher interest for loans, are often victims of payday lending, and pay higher premiums for insurance as they are identified as “credit risks” on their credit reports. It often bleeds over into marital issues, innocent children suffering due to foreclosures and lack of sufficient funds to meet their daily needs, and also leads to health implications due to stress and the lack of ability to provide preventative care.</p>	<p>economics and personal finance.</p>
<p>Kim Wilkerson, Vice President, Virginia Community Credit Union</p>	<p>Commenter requests the final regulations include requiring all high school students complete a financial literacy course. Commenter states that students today graduate with calculus but cannot balance a checkbook. They have no understanding of the basics of personal finance therefore explaining low credit scores and the inability to correct credit problems.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Cheryl Ayers, Director Center for Economic Education Lynchburg College</p>	<p>Commenter supports requiring an economics/personal finance course for every high school graduate (not just those earning an advanced diploma).</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Melanie Marks</p>	<p>Commenter supports a stand-alone economics & financial literacy course for all high school students. Commenter states that financial literacy incorporates an understanding of economics, personal finance and investing, smart saving, wise use of credit, and understanding of taxes, insurance, etc.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Emily Willis, Librarian, Culpeper Middle School</p>	<p>Commenter believes it does not make sense to add an economics/personal finance requirement only for students pursuing an advanced studies diploma. Commenter states that all students would benefit from this type</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	of instruction and that adding an elective requirement is not a good idea. Commenter states that students pursuing advanced studies diplomas are usually overbooked with activities and classes.	
Mary Ellen Hutchind, Culpeper Middle School	<p>Commenter states that language in 8VAC20-131-30. Student achievement expectations should read:</p> <p>“...students who are accelerated shall take the test of the grade level enrolled or the tests for the grade level of the content received in instruction. No student shall take more than one test in any single content area in any tested grade.”</p> <p>Commenter removed the words "be required to." Commenter opposes double testing and requests that students stop being double tested because it only makes some schools look better than they really are and others look worse than they really are. Commenter believes ending double testing will show how/what students are really learning across the state.</p>	The Board has made further amendments to strengthen its position that students shall not be double tested.
Carolyn Inskip Culpeper Middle School	<p>Commenter opposes double testing and does not feel the changes in 8 VAC 20-131-30 are strong enough. Commenter suggests that the language should state "NO STUDENT SHOULD BE ALLOWED to take more than one test in any single content area in any tested grade."</p>	The Board has made further amendments to strengthen its position that students shall not be double tested.
Bruce T. Whitehurst, President and CEO, Virginia Bankers Association	<p>Commenter believes it is time to require all students to take a course in economics and personal finance. Commenter urges the Board to find a way to include such a course in all diploma tracks. Commenter states that there is a need to educate our youth on basic financial literacy.</p>	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jenifer Choi-White Secondary Alternative Education Teacher Waynesboro High School	<p>Commenter opposes creating a "Graduation and Completion Index" which would be used for accreditation purposes. Commenter believes schools should not be put at risk of not receiving accreditation because students with extenuating circumstances do not graduate on time.</p>	The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.
Vicki L. King, Librarian	<p>Commenter states in reference to 8</p>	While the Board has continued to

<p>Beverley Manor Middle School</p>	<p>VAC 20-131-140 Academic and Career Plans that “this one of those well-intentioned plans created by someone far removed from the classroom. This plan does nothing more than add yet another piece of paper to be completed and filed just so the school can say it is compliant. No one in any K-12 public school has time to do what is proposed. A piece of paper does not improve a child's education: only a well-planned teacher can do that. The state continually adds things to the teacher's plate without every taking anything away. Our guidance counselors are well-equipped to guide students down the correct educational path through conferences and scheduling. No further documentation is needed.”</p>	<p>require the plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has delayed the implementation date for this provision by one year to give school divisions increased planning time for this requirement.</p>
<p>Stacy K Puckett, Controller Virginia Bankers Association</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>John R. Milleson, President and CEO Bank of Clarke County</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Kellee Edelin Assistant/Project Manager Virginia Bankers Association</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Gail N. Askew Manager, Health & Welfare VBA Benefits Corporation</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>N Byrd Newton, President Northern Neck State Bank</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Amy P. Binns Training Events Manager Virginia Bankers Association</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Bobby Fothergill Vice President / Agency Manager Virginia Title Center, LLC</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

E.J. Fogarty	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Suzanne Jenkins Senior Accountant Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Matthew J. East Collections Representative Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Francine A. Bramble Administrative Assistant VBA Benefits Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Mrs. Nancy M. Moga, Principal Callaghan Elementary School	Concerning the proposed change in 8VAC20-131-210. Role of the principal: <u>“Notify the parents of students removed from class for disciplinary reasons for two or more consecutive days in whole or in part.”</u> Commenter states that this is the practice in most schools. Commenter suggests changing parents to parent or guardian. Commenter states that principals rarely have enough time to contact one parent let alone both.	The Board amended the language to state “notify the parent or guardian” and stated that the school shall have met its burden by making a good faith effort to provide such notice.
Jeanette Burrows-Holt Credit Administration Assistant Bank of Botetourt	Commenter endorses the requirement of a class in economics and personal finance for all high school students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Scott Horchler SunTrust	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Robert N. Fothergill	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Rita Cook-Raynor Banking Officer American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Rex A. Hockemeyer Executive Vice President	Commenter urges the Board to require all students to take a high school	Pursuant to overwhelming comment the Board of Education amended the

Union Bankshares Corporation	economics and personal finance course and include such a course in all diploma tracks.	proposal to include one credit in economics and personal finance.
Trudy C. Epps American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Robin Brown American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Beverly Terry	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Helm Dobbins Executive Vice President American National Bank and Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Charles H. Majors President & Chief Executive Officer American National Bank & Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Lisa Johnston, MBA Accounting Operations Supervisor American National Bank & Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Sandra P. Buchanan Credit Clerk American National Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Meredith T. Moore	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Carol M. Barnett Executive Assistant to Jeffrey V. Haley American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Kim Richardson Principal-Forrest Elementary	Concerning the proposed change in 8VAC20-131-210. Role of the principal: <u>“Notify the parents of students removed from class for disciplinary reasons for two or more consecutive days in whole or in part.”</u> Commenter states that this is the	The Board amended the language to state “notify the parent or guardian” and stated that the school shall have met its burden by making a good faith effort to provide such notice.

	practice in most schools. Commenter suggests changing parents to parent or guardian. Commenter states that principals rarely have enough time to contact one parent let alone both.	
Allison Mease StellarOne	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Stuart Evans American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Maxine Nester	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Bobbi Weimer Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Susan Mason Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Richard G. Frank, Executive Vice President StellarOne Bank	Commenter applauds the Board’s effort to institute personal financial literacy courses in the curriculum of Virginia schools, and urges the Board to expedite the requirement.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Anne and Raymond Worley	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Neal Petrovich Executive Vice President and Chief Financial Officer American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Michelle A. Alexander Senior Vice President & CFO Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Brenda B Reagan American National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

Tara Y. Harrison, CPA, Director of Internal Audit Stellar One Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Leta Beecher	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Michael A. Estes VP-Area Exec. Pendleton Comm Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Donna Hankins, Director of Human Resources American National Bank and Trust Company	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Joseph A. Hoge Director of Corporate Loan Review StellarOne Corporation	Commenter advocates for an economics and personal finance course.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Maggie Elbourn	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Stephanie A. Hottle Customer Service Representative Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Michele Haynie Executive Assistant Shore Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Gary R. Shook President Middleburg Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Pat Henderson Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Tasha W. Parrish Processor / Cash Flow program Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Joseph Boling, Chairman and	Commenter urges the Board to require	Pursuant to overwhelming comment

Anna L. Campbell Middleburg Financial Corporation (SOA Box)	all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	the Board of Education amended the proposal to include one credit in economics and personal finance.
G. Leonard Pittman, Jr. Corporate Banking Market Manager StellarOne	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Thomas H. Richardson Vice President Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jeffrey W. Farrar, CPA Executive Vice President and Chief Financial Officer StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Patricia R. Lewis VP & Director of Human Resources Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
George M. Longest, Jr. Bank of Essex	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jason R. Brady Vice President & Lending Officer Rappahannock National Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Teresa Rowe Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Patricia L. Clark, Residential Loan Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Garland L. Humphries Vice President - Credit Administration Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Kasey Milby Administrative Assistant Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Andrew T Shotwell	Commenter urges the Board to require	Pursuant to overwhelming comment

Senior Vice President - Operations Bank of Botetourt	all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	the Board of Education amended the proposal to include one credit in economics and personal finance.
Melissa Norris Teller Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Becky Foster Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Nancy Bowley Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Sheri H. George Loan Processing Center Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Cathy Mise AVP & Loan Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Mary D. Tabor StellarOne Senior Vice President	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Penny Gilbert Branch Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
G. Lyn Hayth, III. President, Bank of Botetourt	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Lisa H. Cannell Director of Human Resources StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Ed Gumphrey Virginia Beach	Commenter endorses adding basic economics training to the high school curricula, for all students, not just those earning an advanced studies diploma.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Teresa W. Stewart, AVP	Commenter urges the Board to require	Pursuant to overwhelming comment

Chesapeake Bank	all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	the Board of Education amended the proposal to include one credit in economics and personal finance.
Dianne Hall VP/Chief Operations Officer Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jack Geier AVP/I.T. Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
William P. Heath, Chairman of StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Randy K. Ferrell, President and CEO Fauquier Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Susan L. Dameron Executive Assistant Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Lee M. Kerns StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Michael R. Kane, Sr. Senior Vice President StellarOne Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jessica Sandlin	Commenter believes the current K-12 curriculum is not enough. Commenter believes economics should also be a requirement in high school.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Theresa L Singer	Commenter requests that the Board consider making it mandatory for all high school students to take a one year course on economics and personal finance. Commenter believes one semester should be devoted to each of those topics, and that it should not be an either/or choice.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

Cathy Jackson Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Phyllis E. Hyde LPC Chesapeake Bank Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Sheila Church Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
G. William Beale President & CEO Union Bankshares Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Howie Soucek HR Director Manry Rawls	Commenter suggests that the Board include a requirement that each student must successfully complete a course in public speaking and a course in economics and personal finance to graduate.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Marlene Caldwell Accountant Bankers Insurance, LLC	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
John & Allison Wilson	Commenter does not support wasting discussion time and money on additional diploma types. Commenter believes the process should be simplified in the school system to support efficient operations.	State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.
Robert H. Williams Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Julia N. Bell Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
John W. Rock Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
James W. "Jim" McAlister Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in

	course and include such a course in all diploma tracks.	economics and personal finance.
John D. Meade, III Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
W. Mark Nelson Chief Financial Officer First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
William H. Hayter President & CEO First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Leton L. Harding, Jr. Executive Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Roberta A. Looney Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Robert “Chip” Glover Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
John P. Bowers Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Carl H. Craig, Jr. Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
James C. Hyson Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Laurie L. Landes Senior Vice President First Bank & Trust Co.	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Melissa Loudermilk Branch Manager Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in

	course and include such a course in all diploma tracks.	economics and personal finance.
Johanna M. Northstein, Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Shelton Land, Land Mindz, Inc Angela Alston	<p>Commenter believes if parents know the importance and difference between diploma types then many parents in the low income community would push their children toward the highest attainable diploma.</p> <p>Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups; (2) provide a small “extra credit” value to Advanced and Standard diploma-earners; (3) weight Special and Modified diplomas below the Advanced and Standard diplomas; and (4) lower the value of all non-diploma options such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.</p>	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Donna Crane IB Coordinator Midlothian High School	<p>Commenter is concerned that the Board proposes requiring two additional standard credits in order to earn an Advanced Studies Diploma – one in economics or personal finance, and one in an elective, thus requiring a total of 26 standard credits for the advanced diploma. Commenter is concerned for International Baccalaureate diploma candidates; they are required to take IB courses in six areas as well as an additional course, Theory of Knowledge. Commenter believes that if added to the state mandates for an Advanced Studies diploma, these requirements make it extremely difficult, if not impossible, for any curricular choices for these students. Commenter inquires whether a state waiver for either of these classes is a possibility.</p>	Students choose to pursue the type of diploma that they wish to earn. Therefore, a choice can be made between an IB diploma and an Advanced Studies diploma. Both are Board recognized diplomas. Pursuant to sections 8 VAC 20-131-290 and 8 VAC 20-131-350 waivers of the diploma requirements are not permitted.
Jackie L. Cooper Staff Auditor Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Paula Owens	Commenter urges the Board to require	Pursuant to overwhelming comment

Mortgage Lending Specialist Chesapeake Bank	all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	the Board of Education amended the proposal to include one credit in economics and personal finance.
Tammy Krejcarek	Commenter relayed concerns on behalf of some teachers regarding the third grade SOL revisions.	The amendments to the Standards of Accreditation are unable to address this issue. This comment would require revisions to the Standards of Learning.
Cheryl Tilley Accounts Payable/Cash Application Specialist Virginia Bankers Association	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Megan Emanuel Chesapeake Bank	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Ginger Smith	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Judi DeDonato	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Sharon Waters, Parent	Commenter believes guidance counselors and special education teachers need to receive better professional development for addressing the different needs of autistic children.	Professional development and special education issues are not governed by the Standards of Accreditation.
Beth Perry	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Lisa M. Roberts	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has

	for all alternative diplomas and other credentials. Schools need teachers and staff who know how to help special needs students graduate with regular diplomas.	been raised from 80 points to 85 points.
Michele Hymer Blitz	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
G. Lynn Wingard	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Sheila Kuders	Commenter believes inadequate and under funded services to support students with special needs after graduation are the more critical issues rather than the type of diploma a special needs student receives.	The regulations do not directly address the resources needed to provide educational services. The “transition planning” for special education services are governed under the special education regulations.
VA Public Schools Graduate	Commenter urges the Board to not base school accreditation only on test scores. Commenter encourages the Board to provide a strong reward system for schools that find ways to keep students engaged in and attending school; to provide incentives to increase graduation rates for Latino/Hispanic students, especially targeting those that are limited English proficient; and to provide incentives to increase graduation rates for pregnant teenagers.	The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.
Barbara Keefe Parent	Commenter supports Standards of Learning and educational support for students with special needs to ensure they graduate with a regular diploma.	Supports for students with special education needs are governed by special education regulations. The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”
Carrie Shuler	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been

	Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	lowered while the index target has been raised from 80 points to 85 points.
D. DiCola Commenter	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Ms. Vasantha K. Rayman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Deanne McNulty	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Keith S. Farrell	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Nancy F. Maloy	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Corrine Loudon	Commenter advocates for requiring a course in economics and personal finance to graduate.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
James T Campbell, CPA VSCPA	Commenter requests that the Board: <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<p>the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	
<p>Kelly Stefanko, CPA</p>	<p>Commenter advocates for requiring a course in economics and especially personal finance to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Tracey D. Coats, CPA Chief Financial Officer CWD Kids</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
E. Neal Post	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Sammy Cohen, MPA, CPA Director of Business Services Virginia Beach City Public Schools</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Tracy Schneider VP - Marketing and Operations CWD Kids</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Bradford R. Jones, CPA CMA CVA Partner, Family Business Group</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>Stephen Y. Dickinson, Controller & CAO Media General, Inc.</p>	<p>Commenter requests that personal finance be included in graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jesse S. Novak Senior, Roanoke College</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Kara A. Whiteley Marketing Manager CWD Kids</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>George E. Nichols Vice President-Finance VTLS Inc.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Jeffrey W. Foutz, CPA University Housing Group, Inc. and Affiliates</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</p>	
<p>Douglas W. Adams CPA, CFP® Tax Manager B. J. Kane & Company, P.C.</p>	<p>Commenter believes that most personal finance courses have a project on picking and tracking stocks out of the financial pages. Commenter requests that these projects be avoided because they do little to teach and they are counter to the concepts of asset allocation portfolio theory that most successful financial planners and investors are using. Commenter believes personal finance courses should be as practical as possible. Commenter considers the exposure to personal finance far more important than the academic teaching of economics which, the teachers will more than likely focus on.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>David S. Timms CPA/ABV, CVA VALUATION ONE OF VIRGINIA BEACH</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i> ”	
James Branham Cost Settlement & Audit Manager Department of Medical Assistance Services	Commenter supports the position of the Virginia Society of CPAs, and advocates for requiring all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Gregory M. Lawson, CPA/ABV Stephanie R. Peters, CAE Virginia Society of Certified Public Accountants (VSCPA) Chair of the Board of Directors VSCPA President & CEO	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Rachel Puckett, CPA Sr. Tax Manager Talecris Biotherapeutics, Inc.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	
<p>Lewis J. Jones, CPA</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Brenda Springer, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
Gordon A. Adler CPA	<p>Commenter supports the Virginia Society of CPA's position to include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Lara B. Casteel, CPA/Legal Assistant Morin & Barkley LLP	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Mary Jo Fields, Virginia Municipal League (VML)	<p>VML’s position is that local governments cannot continue to be the senior partner in funding education. VML requests that any revisions to standards that increase costs need to have funding attached to them, and that the Board not impose new funding and administrative requirements. VML further requests that the Board review</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>

	<p>standards to determine if there are any that can be deferred or delayed. If the state cannot fund the mandates and requirements under the standards of accreditation and the standards of learning, then those standards should be revised to reflect what can be funded.</p>	
<p>Dr. Randy D. Barrack Executive Director/CEO Virginia Association of Secondary School Principals, Inc. President Virginia Foundation for Educational Leadership, Inc.</p>	<p>Virginia Association of Secondary School Principals (VASSP) has two distinct concerns regarding the proposal to require Academic and Career Plans for all 7th and 8th graders. First, VASSP believes that middle school students are not of a maturity level to make firm decisions about career paths. Currently educators promote career exploration during the middle school years through elective courses and via large group approaches (i.e., Career Days) in order to expose students to a range of career paths. Educators believe this methodology of early exposure to the career discussion is the best and most age appropriate way to introduce students to the widest variety of fields. Second, regulations that address academic and career guidance already exist in the Virginia Administrative Code Chapter 620 8VAC20-620-10 requiring each school to make “reasonably available with available resources” academic and career guidance to all students. Within these parameters, each school division must assess its capabilities and priorities based on available funding and local objectives.</p> <p>The VASSP recommends that the Academic and Career Plan initiative might be more effectively accomplished through means of a statewide survey to ascertain how each school division currently approaches academic planning as well as the different ways schools provide career information. Results of the survey could then be used to create a “best practices” inventory as well as an assessment tool, which could be utilized as an accountability measure for future reporting purposes.</p>	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level.</p>
<p>Digby A. Solomon President & Publisher</p>	<p>Commenter urges the Board to require all students to take a high school</p>	<p>Pursuant to overwhelming comment the Board of Education amended the</p>

<p>Daily Press</p>	<p>economics and personal finance course and include such a course in all diploma tracks.</p>	<p>proposal to include one credit in economics and personal finance.</p>
<p>Dr. Kitty J. Boitnott, President, Virginia Education Association (VEA)</p>	<p>VEA comments address the following sections of the regulations:</p> <ul style="list-style-type: none"> • 8 VAC 20-131-30- VEA supports the proposed revision clarifying that no student can be required to take separate tests for both their enrolled grade level and for the advanced grade level of the content received in instruction. • 8 VAC 20-131-50- VEA supports efforts to elevate public perception of career and technical education. VEA believes not only should new diplomas be created but a more comprehensive system with a broad spectrum of assessments that prepare students for the workforce should be created. • 8 VAC 20-131-50- VEA does not believe that altering diploma requirements or changing course sequences will work without additional state funding for overburdened localities. • 8 VAC 20-131-140- VEA opposes the academic and career plan proposal by the Governor. VEA believes the plans create extra paperwork that will fall on school staff taking time away from instruction. Also this proposal will require in-service training; the development of software; and additional personnel. VEA believes assessment of the fiscal impact is needed. • 8 VAC 20-131-210- VEA supports the revisions to this section. • 8 VAC 20-131-280 – VEA has concerns regarding unintended consequences of the graduation and completion index and the possibility it will result in channeling students into GED programs. VEA would like to work with the Board to develop a system that encourages schools to work towards higher graduation 	<p>State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations. While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>

	<p>rates, including rewarding schools for keeping students engaged; awarding points for diplomas according to their value to students after high school, and disaggregating graduation data to ensure vulnerable students are not left behind.</p>	
<p>Pamela H.Orsini, CPA Golden Living</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Ken Yasnowsky</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Kathleen E. Valentine</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Kevin Simowitz Virginia Organizing Project</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Angela Ciolfi Just Children</p>	<p>Just Children supports:</p> <ul style="list-style-type: none"> • The use of a graduation and completion index for high school accreditation; • Giving schools credit equal to the values of the credential for students who receive a diploma or GED or who remain in school working to achieve a diploma or GED; • Giving schools credit for keeping students in school no matter the amount of time it takes to earn a diploma or GED. <p>Just Children opposes:</p> <ul style="list-style-type: none"> • Awarding points for certificates of completion; • Setting the target closer to the 	<p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

	<p>value of a GED than to a diploma;</p> <ul style="list-style-type: none"> • Treating all diplomas equally when they are not equal in value to students; • The absence of any accountability for narrowing graduation gaps. Commenter asserts data should be disaggregated for accountability purposes. <p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Increase the target to at least 90 points using the existing graduation and completion index; and • Change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas <p>OR</p> <ul style="list-style-type: none"> • Keep the target at 80 points; but also • Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion; and • Require high schools to reach the goals, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students. 	
<p>Lilli Hoffman</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

<p>Roger Lewis</p>	<p>Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports the Virginia Board of Education’s consideration of a requirement for increased high school focus on economics and personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jeffrey Szyperki Chairman, President, and CEO Chesapeake Bank</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Amy Eckard</p>	<p>Commenter feels that although Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements is a good idea the real focus should be on basic math and English.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Margaret Greene</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<i>Personal Finance."</i>	
Hunter Edwards	<p>Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports the Virginia Board of Education’s consideration of a requirement for increased high school focus on economics and personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Dianne E. Hall, Accountant Michael B. Cooke, C.P.A., P.C.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Bonnie C. Turner, CPA, FLMI Director Variable Accounting Genworth Financial</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	
<p>Jennifer R. Commander, CPA Partner and Chief Financial Officer Winston Partners</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</p>	
Janet A. Rivara	<p>Commenter is in favor of teaching finances to high school students. Commenter advocates for such a curriculum for special needs students. Commenter believes such instruction should actually be offered in middle school along with earlier vocational and technical options.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Windora Bradburn	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Rebecca Tiblin	<p>Commenter supports the recommendations made by the Virginia Society of Certified Public Accountants to include, at the minimum, one unit of credit in economics <i>AND</i> in Personal Finance in graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

<p>Derek Myers Associate Professor Emeritus Virginia Tech</p>	<p>Commenter requests that the Board consider adopting a combined financial literacy and basic economics curriculum as a graduation requirement for all of Virginia's high school seniors.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Christine Radcliffe Haddon, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jon Bridges</p>	<p>Commenter advocates for a mandatory requirement for Virginia public high school students to take/pass at least one course on Economics/Personal Finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jennifer L. Todd, CPA Managing Member Todd & Price, PLC</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Bradley P. Nicklin Partner Beers + Cutler</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	
<p>Susan Boothe Controller ST Solutions</p>	<p>Commenter supports regulations establishing standards for financial courses in our Virginia schools.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Christine Roby</p>	<p>Commenter inquires into why it has taken the Board so long to establish Standard Technical and Advanced Technical diploma programs. Commenter also supports requiring all high school students take a financial literacy course.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Tom Rosengarth, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Melissa C. Goemann, Juvenile Law and Policy Clinic, UR Law</p>	<p>Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups; (2) provide a small “extra credit” value to Advanced diploma-earners; (3) weight Special and Modified diplomas at 100 points; and (4) lower the value of all non diploma options such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Brian Johns</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Katherine B. Hoffman, President Charlottesville National Organization for Women</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Adelaide Alexander</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point</p>

	schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
John Blair Reeves Sr.	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Jim & Mariett Eggleston (SOA BOX)	Commenter supports financial literacy for high school students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Lisa Cusack	Commenter requests that the Board consider adopting a combined financial literacy and basic economics curriculum as a graduation requirement for all of Virginia's high school students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Alice Cannon	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Kinne J. Hoffman	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Margaret Kertess	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.

	Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.	
Rebecca Slickis	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Becky Thomas	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Geraldine Woodley	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Susan Clark	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Janice Armstrong	Commenter states that special education students are capable of meeting and need to meet the same standards as all students. Commenter believes that if schools are to prepare special education children for independent living, employment, and further education the students need a high school diploma that means the same for all children. Commenter believes excusing special education students from SOL exams through portfolios has totally relieved the	The majority of commenter's concerns are addressed in special education regulations. Supports for students with special education needs are governed by special education regulations. The Standards of Accreditation state in 8VAC 20-131-50 D.1 that "[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma."

	<p>elementary schools of their accountability in teaching kids to read and do math. Commenter states that students who are two and three years behind in reading and math are passing advanced proficient on VGLA, but they are not being taught to read. Commenter states that graduation and a diploma should mean something and it begins in the primary reading programs.</p>	
<p>Len Dillon, President Dillon Insurance Agency, Inc.</p>	<p>Commenter supports requiring economics and financial literacy to graduate. Commenter believes there should not only be a basic personal finance class but higher level classes as well. This class should include the basics of savings and investment, principles of interest, basic stock market knowledge and personal taxes.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>J. Bradley McCall, CIC, CISR, Treasurer McCall Insurance Agency, Inc.</p>	<p>Commenter supports requiring economics and financial literacy to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Gary S. Zuckerman A&R Associates</p>	<p>Commenter believes that every student must pass a course in economics and personal finance as a condition of graduation.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Linda A. Conner Business Development Officer & Lender American National Bank & Trust Company</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>R. Michael Hedden Senior Vice President / Director of Operations Bankers Insurance, LLC</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Terrance E. Rogstad, CPA Shareholder Swart, Lalande & Associates, P.C.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> <i>Personal Finance.</i>” 	
<p>William Duval</p>	<p>Commenter requests that the Board change whatever laws/regulations/rules that may need to be changed to: increase graduation rates, and reward the hard work by all those thousands of children with varying degrees of disability in the accomplishment of successfully navigating the SOL tests. Commenter believes that children with disabilities’ work should be reflected by them earning at the very minimum a standard diploma.</p>	<p>Supports for students with special education needs are governed by special education regulations. The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p>
<p>Karen S. Killian, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</p>	
<p>Kelly Murphy</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Ed Brugh</p>	<p>Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements. Commenter supports teaching about all types of lending, what to avoid and what loans to seek out, including instruction on conventional mortgages, FHA mortgages, USDA mortgages, home equity loans, second mortgages, credit card loans, student loans, 90 day notes, auto loans, commercial loans, and SBA loans. Also it would be good to give instruction on life insurance, such as whole life and term life. Another item of instruction would be the development of a family budget, saving money, retirement planning, employment loss planning, college funding planning, and home ownership planning.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Paige T. Lilley W. T. Chapin, Inc.</p>	<p>Commenter does not “feel that the requirement should be either or on</p>	<p>Pursuant to overwhelming comment the Board of Education amended the</p>

	Economics for Financial Literacy.”	proposal to include one credit in economics and personal finance.
Andrew T. Martin, C.P.A. Corbin & Company, P.C.	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Neil Turner	Commenter requests that the Board adopt new requirements for graduation to include meaningful instruction in economics and personal finance as a requirement for graduation for all Virginia high school students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Ginny Napier Director of Guidance Poquoson HS	Commenter supports the addition of economics/personal finance to the high school graduation requirements. Commenter does not like the requirement for the standard diploma that gives students the option of a foreign language, economics, or personal finance. Commenter believes it makes no sense for one segment of the graduates to not be required to take the course, and that foreign language is certainly beneficial but it is not an	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

<p>Valerie R. Coley</p>	<p>appropriate substitute.</p> <p>Commenter believes in the importance of implementing incentives in the Virginia School System. Commenter states that there are children who cannot read or sound out the alphabets, but are being pushed through a system that is not helping them to even get to a point of graduation. Commenter feels the focus should be on the basics, phonics and implementation of some type of life skills/vocational training. Commenter states that every student isn't academically successful but if we place academics along with Vo-Tech there would be a change in the school system and the drop out rate.</p>	<p>The Standard Technical Diploma provides options to students who would benefit from CTE.</p>
<p>Matthew Freeman</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Adrienne E. Volenik Director, Disability Law Clinic Acting Director, National Center for Family Law School of Law University of Richmond</p>	<p>Commenter's concern with the proposal is that schools receive the same point values for awarding Special and Modified Standard diplomas as they receive when awarding Advanced and Standard diplomas. Commenter states that these diplomas put graduates at a disadvantage in the marketplace, with the military, and with four-year</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

	<p>colleges and community colleges. Commenter states that data reveals that many special education students capable of earning Advanced or Standard diplomas are instead earning Modified or Special diplomas. Commenter states that there are no state wide guidelines as to how many may be awarded. The 2008 On-Time Graduation Results data reveals that, while students with disabilities graduate at roughly the same rate as the overall population, the type of diplomas awarded to students with disabilities varies widely across the state. Commenter asserts that this wide variability reveals that many disabled students are not given a fair opportunity to achieve to their full potential. Commenter believes that this variability can be remedied by a firm standard from the state that serves as an incentive to all school systems to help disabled students achieve the highest attainable credential. Commenter indicates that some school districts are offering special education students no opportunity to earn Standard and Advanced diplomas. Commenter asserts that by setting the graduation rate at 80 points and awarding Modified Standard and Special Diplomas at 100 points, schools have no incentive to push students with disabilities to meet the “challenging expectations that have been established for all children” under the federal IDEA and Virginia regulations requiring that “every student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” Commenter requests that the Board (1) increase the target to promote diploma graduates and eliminate graduation gaps among student subgroups, (2) provide a small amount of “extra credit” value to Advanced and Standard diploma-earners or weight Special and Modified diplomas somewhat lower than Advanced and Standard diplomas; and (3) lower the value of all non diploma options such as GEDs to reflect the diminished opportunities that they offer to students.</p>	
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<p>Ronald F. Miller President & CEO Summit Community Bank</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Daniel G. Waetjen Group/State President Greater Washington DC Banking Region BB&T</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jim Thomas Executive Vice President Chief Credit Officer EVB</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Norman Blanchard</p>	<p>Commenter asserts that if the Standard Technical Diploma and the Advanced Technical Diploma are to be introduced, students should be able to receive more intensive and student specific instruction in math classes prior to entering the ninth grade. Commenter believes encouraging new approaches to math and science classes may help steer students toward the technical diplomas. For the graduation and completion index Commenter asserts that GED recipients should be rated at 85 points. Commenter states that the GED has undergone significant revision in recent years and should be accepted as a viable alternative to a regular diploma. Commenter believes that schools should receive more credit than proposed for preparing students to pass the GED while enrolled in high school or within a year after they have left school. Commenter asserts that students not graduating but still in school should receive 80 points. Commenter urges the Board to celebrate students remaining in school in order to complete their education. Commenter suggests creating a responsibility index for students, parents and community members.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Debbie Barnes</p>	<p>Commenter believes there should be something on the SOL about simple life things, such as balancing a check book, percentage rates, and money management.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Heather and Barry Gale</p>	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point</p>

	<p>schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	<p>value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
Bob Good	<p>Commenter supports Sarah Hopkins Finley's article about a proposal for adding economic and/or personal finance classes for graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
R.R. Casasnovas	<p>Commenter states that students in elementary, middle and high school levels should receive instruction in an economics curriculum, and all levels need a basic and fundamental understanding of economics and knowledge of checkbook balancing, budgeting, saving, and investing.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Elizabeth H. Nolte, CPA	<p>Commenter urges the Board to include both personal finance and economics as a requirement for high school graduation. Commenter believes students should be well educated in financial matters with an understanding of the use of credit, banking, how to get a loan, the consequences of borrowing, how supply and demand affect pricing, the tax system, why money is deducted from their paychecks for federal and state withholding, Social Security and Medicare, how to balance a checkbook, and fill out a simple tax return.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Shirley A. Gary	<p>Commenter urges the Board to require all students to take a high school economics and personal finance</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in</p>

	course and include such a course in all diploma tracks.	economics and personal finance.
Susan Proffitt	Commenter urges the Board to require all high school students take, and pass, an economics and personal finance course.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Sarah Hopkins Finley Executive Director Virginia Council on Economic Education	<p>Commenter urges the Board to require all high school students to pass an economic/personal finance course as a requirement to graduate. The Council suggests modifications to the current proposal, to achieve this without eliminating other required courses:</p> <ul style="list-style-type: none"> • For the Standard Diploma, replace one of the five elective options to require an economics/personal finance course • For the Advanced Studies Diploma, replace the option to take economics <i>or</i> personal finance with the requirement for a single combined course • For both the Standard and Advanced Technical Diplomas, students could have the option of satisfying a required economics/personal finance credit as one of the four career and technical credits or electing it as an option as currently proposed or as part of satisfying one of the social science credits. With some modification, an existing Business education course (Finance 6121) would provide a good economics/personal finance course for students. 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Desiree Childress	<p>Commenter requests that the Board</p> <ul style="list-style-type: none"> • look at and revamp the list of computer accommodations available for students with disabilities (color/filter screens, enlarged font, voice over options, reading options, and hiding icons should be standard accommodations) • make VGLA/VSEP offered and reviewed in each IEP during the 8th grade year • have avenues and supports in place for VSEP in high school • provide students who take the VGLA/VSEP with the opportunity to take the SOL with accommodations for practice and 	The majority of commenter’s concerns are addressed in special education regulations. Supports for students with special education needs are governed by special education regulations. The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”

	<p>knowledge for higher education opportunities,</p> <ul style="list-style-type: none"> • keep all students in a general educational setting with appropriate supports, • look at the curriculum framework and add multisensory learning within the scope of SOL. 	
Preston Lemon	<p>Commenter requests that the Board (1) increase the target to 90 points or more to promote diploma graduates and eliminate graduation gaps among student subgroups, (2) provide a small amount of “extra credit” value to Advanced diploma earners (3) weight Special and Modified diplomas below Advanced and Standard diplomas; and (4) lower the value of all non diploma options such as GEDs and Certificates of Completion to reflect the diminished opportunities that they offer to students.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
Kelly Godwin - UR Juvenile Law and Policy Clinic	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Disaggregate the graduation data between white males and black males. • Give schools incentives to retain students. • Reward schools who keep students engaged. • Implement retention programs to keep students in school. • Ensure that full credit is not given for credentials that don’t offer full opportunities. • Create incentives for early planning and high expectations. • Give full credit only for standard and advanced diplomas while other options are weighted according to the value to the student after high school. • Disaggregate graduation data about Virginia’s most vulnerable students. 	<p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
Parents of an autistic child in Blacksburg	<p>Commenter believes guidance counselors and special education teachers need to receive better professional development for addressing the different needs of autistic children. Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so</p>	<p>Supports for students with special education needs are governed by special education regulations. The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the</p>

	that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. Schools need teachers and staff who know how to help special needs students graduate with regular diplomas.	point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Heather Tower	Commenter does not want the educational bar lowered. Commenter believes our educational standards are failing the American people.	This comment is not related to specific provisions within the regulations.
Pamela E. McIntire	Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Anne Chapin	<p>Commenter requests that the Board increase the target to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.</p> <p>Commenter is concerned about the points awarded to certificates of program completion with the opinion that there is no evidence that they provide any benefit to students. The Commenter suggests that the SOA include dropout prevention that rewards schools for keeping students engaged in school; for diplomas only the Standard and Advanced Diplomas should get full credit; other options such as GEDs, Certificates of Program Completion, Special Diplomas and Modified Standard Diplomas should be weighted according to their value to the student after high school; disaggregation of graduation data about Virginia's most vulnerable students to ensure success for all.</p>	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Mary Wagner	<p>Commenter feels the accreditation system should reward schools for providing instructional programs to meet the needs of at-risk students to help them graduate on time.</p> <p>Commenter requests that the Board increase the target to at least 90 points.</p>	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.

<p>Congressman Robert C. “Bobby” Scott</p>	<p>Commenter is concerned that the proposed standards do not place enough emphasis on awarding students a regular diploma. Commenter suggests that the proposed standards are too lenient in the area of alternative credentials and detract from encouraging students from pursuing regular diplomas. Commenter’s second concern is that the proposed standards do not require increased graduation rates for all students especially minority and low income students. Commenter requests that the graduation rates be applied to individual groups of students and that the data be disaggregated.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Sally W. Southard Chairman, Salem City School Board</p>	<p>Commenter requests that the Board make personal finance and economics required courses for graduation, give school divisions the flexibility to decide which teacher licensure codes are acceptable to teach these courses, and that school divisions be able to decide if the course requirements are taught as two semester 0.5 credit courses or one 1.0 credit full year course.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jan Pingel Binford Middle School</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal Finance.” 	
<p>Richard Paul Haigh Grafton High School</p>	<p>Commenter urges the Board to require all students to take a high school personal finance course to graduate that includes ethics.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Frank Chimento</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<ul style="list-style-type: none"> • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
Kathy Bergmann Woodbridge Senior High School	Commenter requests that all students be required to take a financial literacy/economics based course for graduation. Commenter believes the existing finance course curriculum available to students in Virginia that is taught in the Business and Informational Technology departments as an elective can be updated to meet the requirements being presented.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Susan Wyatt	Commenter encourages the Board to approve the proposal to incorporate economics <i>or</i> financial literacy as a one credit elective course option or a required course option of three diplomas (standard, advanced studies and standard technical).	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Elizabeth Pase Business and IT Instructor	Commenter requests that all students be required to have both a course in Personal Finance and a course in Basic Economic Theory. Commenter states that despite the number of credits required for graduation, seniors should be required to attend school all day unless they have employment in a co-op type job arrangement which is oriented towards a career goal. Commenter does not believe working at a fast food business meets that description. Commenter believes students, and society in general, are being done a huge disservice when the minimum required is accepted as sufficient.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. Full day attendance is left to local school division policy.
Richard G. Smith, CPA/ABV, Member Witt Mares, PLC	Commenter requests that the Board require a course in economics AND personal finance, not economics OR personal finance.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Carolyn Meyer RN BSN	Commenter states that every school should have a nurse with the ratio of 1 nurse to 750 students. Commenter believes this is necessary to address	Student nurse ratios must be addressed in legislation affecting the Standards of Quality. The Accrediting regulations do not address student

	<p>student needs such as food allergies, asthma, diabetes epilepsy, sickle cell anemia, or handicaps requiring assistance, injuries, and illness that occur during the day. Commenter believes having a non-professional staff member do this type of work is setting the schools up for liabilities. Commenter wants legislation to mandate nurses in every school with an adequate ratio of students per nurse.</p>	<p>nurse ratios.</p>
<p>Barbara Cullerton, CPA, Senior Manager CS&T CPAs</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Ann B. Emerson, School-to-Career Specialist Department of Instruction Stafford County Public Schools</p>	<p>Commenter is in favor of requiring Academic and Career Plans for 8th graders. Commenter believes students need to realize that mathematical and scientific reasoning and problem-solving, analytical skills (developed in social studies), reading and writing are critical components of career and life success. Commenter believes that this</p>	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used.</p>

	<p>goal can only be accomplished with significant career development. Commenter believes that creating bridges between these subject areas is something that career development can achieve. Commenter asserts that the state needs to ensure adequate time, attention, and funding is provided and that schools are required to do career development. Career development needs to be directed by educational professionals who are well-qualified, and not stretched between too many other tasks.</p>	
<p>Ken Bassett History and Social Sciences Office of Student Learning and Professional Development Prince William County Public Schools</p>	<p>Commenter is troubled by implementation of the Personal Finance objectives developed in 2006. Commenter asserts that although the objectives are aligned to standards in three content areas: Mathematics, Career and Technology Education, and History and Social Sciences, the objectives are most often implemented in the 12th grade Government course. Commenter states that the history and social science curriculum community was not consulted in the creation of the standards that many of them now must teach so many 12th grade teachers report feeling inadequately prepared to teach the course. Commenter requests that the economics objectives currently found in the 12th grade US Government standards be removed from that course. Commenter’s rationale is that adding a graduation requirement that includes economics standards (apart from personal finance objectives), would be redundant given the current 2001 standards: GOVT. 14,15,16 and the 2008 revised standards: GOVT. 12,13,14,15,16. Commenter asserts that given the recent revisions of the Government standards, it may be that the Board will not entertain the suggestion of revisiting the standards. In that event, commenter wants to express support for the addition of a financial literacy course requirement that included the economics objectives with the understanding that VDOE remove those standards at the next revision cycle on the grounds that the underlying course work for the CTE</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>endorsements for personal finance and economics are the best preparation for teaching these topics to our students. Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics and personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. • Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. If a statewide graduation requirement in economics and personal finance is not feasible, for consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the Virginia JumpStart asks that language be amended for the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.” 	
<p>Mike Ellerbrock Director - Center for Economic Education Agricultural & Applied Economics Dept College of Agriculture & Life Sciences, Virginia Tech</p>	<p>Commenter request that the Board require all high school students take a full course in economics and financial literacy as a requirement for graduation. Commenter states that the Virginia Council on Economic Education will train the Commonwealth's teachers.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Dennis Winfree, CIC Horizon Insurance Services</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Helen Harman, Counseling Director, Counselor, Grades 10-12, A-G</p>	<p>Commenters are opposed to the addition of a new career and technical</p>	<p>State law mandates that the Board of Education add the standard technical</p>

<p>Pam Elmore, Counselor, Grades 10-12, H-M Lynn Briggman, Counselor, Grades 10-N-Z Jimmy Miller, Counselor, Grade 9 Spotswood High School</p>	<p>diploma option. Commenters feels that students will be faced with another decision to make at too young of an age. Commenters think it would be wise to encourage looking at the various options that currently exist without having to make a choice of diploma linked to that choice. Commenters believe the “tone” of the proposal is driving a wedge between those who are “college bound” and those who are on the “vocational track.” Commenters believe adding these new diploma options waters down the Standard Diploma considerably. Commenters suggest that instead of adding a Technical Diploma, make the standards of receiving the Career and Technical Seal more rigorous. Commenters suggests that if the Assembly is adamant on adding the Technical Diplomas then maybe the CTE seal needs to be removed altogether. Commenters feel the Board has created diplomas without consulting people in charge at the local school level. Commenters assert that the two new diplomas will put more work on counseling staffs with many already overburdened due to budgetary cuts. Commenters request that the state make the technical diplomas a local option and give the localities and systems room to be flexible in modifying the courses that are needed to meet the definition of the Career and Technical diplomas. Commenters assert more guidance counselor staffing is needed to implement the proposed regulations. Commenters request that the state revisit the Standards of Quality as they relate to Guidance staffing. Right now, staffing is at 350:1 student:counselor ratio at the high school level. Commenters assert that with an increase in the rise of mental health-related issues in young people and the existing duties of counselors, the State should not expect a counseling staff to take on additional requirements without looking at adjusting this ratio.</p>	<p>and advanced technical diplomas to the accrediting standards. The CTE seal is required by statute. To remove the seal legislative action would be required.</p>
<p>Alison Ludwig</p>	<p>Commenter believes it would be a</p>	<p>While the Board has continued to</p>

	<p>waste of time and money to develop and maintain a personal academic and career plan for each seventh- and eighth- grade student. Commenter asserts that most adults are not currently doing what they planned to do when they were in 7th grade, 9th grade, or even end up doing what they planned when they're 1 year out of high school.</p>	<p>require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used.</p>
<p>Glory Gill, RN, BSN, MPA HCS School Nurse Wythe Elementary</p>	<p>Commenter requests that the Board mandate having a school nurse in each school at a ratio of 1:750 students. The No Child Left Behind Act has increased the work of nurses including trach care, increased medication administration, feeding tube care, seizure monitoring and treatment, and care of asthmatics with inhalers and nebulizers.</p>	<p>Student nurse ratios must be addressed in legislation affecting the Standards of Quality. The Accrediting regulations do not address student nurse ratios.</p>
<p>Jenna J. Konizer</p>	<p>Commenter supports the Standard Technical Diploma because more students would benefit from taking advantage of the excellent opportunity to begin a technical career while in high school and to graduate with marketable skills. Commenter asserts that the state should provide its share of funding for the increased costs associated with this new diploma. Commenter believes 7th grade is too early to begin a formal program like the one proposed by the Academic and Career Plan. Commenter believes that in middle school time and resources would be better spent on career information and exploration. For the Graduation and Completion Index commenter thinks the proposal to reduce point value for students that take more than 4 years to graduate is too harsh. Commenter believes that schools should not be punished for circumstances that schools have no control over. The emphasis should be on working as hard as we can to help students graduate, no matter what it takes. Commenter suggests that a workable compromise would be to reduce point value if students take more than 5 years to graduate.</p>	<p>State law mandates that the Board of Education add the standard technical and advanced technical diplomas to the accrediting standards. The CTE seal is required by statute. To remove the seal legislative action would be required. While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Jennifer G. Cornell</p>	<p>Commenters support the amendment</p>	<p>Pursuant to overwhelming comment</p>

<p>Executive Director Timothy P. Schilling, Associate Director Kenneth T. Berents, Chairman, Board of Directors, Powell Center for Economic Literacy Collegiate School</p>	<p>of Virginia’s graduation requirements to require that all students in the state complete a course in economics and personal finance in order to earn a high school diploma. Commenters encourage the Board to consider enhancing Virginia’s Social Science Standards of Learning to include more emphasis on economics and to teach economics to elementary and middle school students.</p>	<p>the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Torey J Edmonds/Community Liaison and Scholar VCU Clark-Hill Institute for Positive Youth Development</p>	<p>Commenter states that youth must be prepared by age 21 and low graduation rates signal problems up and down the developmental continuum – from birth to young adulthood.</p>	<p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Jen Martin Business and Information Technology Teacher Strasburg High School</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</p>	
<p>Steve Craig Acting Coordinator Adult HS Completion Programs Fairfax County Public Schools</p>	<p>Commenter requests that the Board consider adding the External Diploma Program as an accreditation factor like the GED; implementing the adult high school diploma using standard credit because motivated students are being thrown out of schools when they reach their credit needs but have not passed the SOL; implementing the original approved language of the adult HS diploma again; allowing Adult HS safe harbor on the graduation rate number; giving alternative schools safe harbor on the graduation rate number; permitting Adult HS, adult GED, and EDP to pass back off time graduation points to the students last school before adult high school. To give the true picture of county success.</p>	<p>The external diploma is not awarded to persons of school age as defined in the Code of Virginia. The GED is included since a GED may be awarded to a person of school age as defined in the Code of Virginia.</p>
<p>Carol Pariser (SOA Box)</p>	<p>Commenter requests that the Board require a personal finance course for high school students to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>James W. Brackesn, Jr. CPA</p>	<p>Commenter is concerned that economics or personal finance would be offered as electives and that both subjects are not required. Commenter suggests that a course in economics and personal finance be required for all students to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>J. Peter Clements President / CEO Bank of Southside Virginia</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Susan K. Floyd, CPA, MSA Faculty - Accounting College of Business JMU</p>	<p>Commenter supports VSCPA's comments and requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics AND personal finance as a requirement for graduation for all Virginia high school students. • Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	the advanced studies technical diploma.	
Robert A. Blackburn Kathleen B. Blackburn	Commenter urges the Board to require all students to take a high school economics and personal finance course.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Bernadette J. Stowe V. P. Finance/ Human Resources Treasurer Southwestern Virginia Gas Company	Commenter urges the Board to require all students to take a high school personal finance course to graduate. Commenter suggests using the curriculum of the Ramsey group: http://www.daveramsey.com/school/	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Annette W. Paxton Counseling Director, Sharon Cunningham, Counselor, Matthew Kinman, Counselor Broadway High School	Commenters are opposed to the implementation of these two new diplomas. The goal of having students concentrate in one area is already addressed by the Career and Technical Diploma Seal and the Advanced Math and Technology Diploma Seal. Commenters assert the development of these diplomas was prepared without the input of the Career and Technology faculty and supervisors; the current proposal fails to address the issues encountered in advising and guiding students in career fields. Commenters believe the two new diplomas will result in more time counselors, students and parents must spend on making sure requirements are being met and takes away from time spent on other issues involving the career, academic, and developmental growth of our high school students. Commenters support the proposal for every high school student to take a personal finance or economics class.	State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations. Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Arthur Auerbach, CPA	Commenter requests that the Board: <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p>	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Terry Swain</p>	<p>Commenter advocates for teaching pragmatic personal business skills such as a student bank. Commenter requests that the Board consider requiring financial education for all grade levels, eventually including not only personal finance but also global economics, business etiquette, and other real, practical information that will benefit the people who go straight to the work force as well as those who go on to higher education.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Edward Schmitz Hantzmon Wiebel LLP</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
Susan B. Wright	<p>Commenter supports requiring all students to take personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
James Maxstadt	<p>Commenter supports teaching financial literacy and economics as standard components of a government course and that separating them out and establishing them as a separate course would be a mistake.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Tim Maloney	<p>Commenter supports requiring all students to take personal finance to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Patricia C. Beeson Human Resources Director Arlington Virginia Federal Credit Union	<p>Commenter supports requiring all students to take personal finance to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
David L. Cox, CPA, CMA, MBA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>Jon R. Maskell, CPA McPhillips, Roberts & Deans, PLC</p>	<p>Commenter requests that the Board: Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Gail Eisner Fisher, CPA Tax Manager PBGH, LLP</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Wright Aloba</p>	<p>Commenter believes the school curriculum is already loaded with finance courses and that all the schools need to do is incorporate "personal finance" chapter or chapters in the already two or three finance courses currently taught in many schools and required for accounting majors. Commenter believes additional courses are not needed.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jeffrey J. Bates, CPA</p>	<p>Commenter requests that the Board:</p>	<p>Pursuant to overwhelming comment</p>

	<ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Meg Gruber Earth Science Teacher Forest Park HS Prince William County Public Schools</p>	<p>Commenter requests that the Board not implement the academic and career plan proposed in 8VAC20-131-140. Middle school aged students do not have a realistic view of what they want to be as an adult.</p> <p>Commenter fears that this tool when used by parents and their children will not be viewed as being flexible. At this age students should be exploring their options not developing a plan that many may feel they must adhere to no matter what. Commenter is concerned about who will do all of the paperwork. Teachers and guidance counselors have enough to do meeting the SOL standards in less than one school year to meet the tests, meeting local school systems requirements in testing and the data disaggregation of the county test and the resulting paperwork. Guidance counselors do</p>	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level.</p>

	<p>not have time to work with students for all the paperwork and their responsibilities for testing and data disaggregation. This new requirement will over burden already over burdened teachers and guidance counselors. Commenter is very concerned about this unfunded mandate coming at a time, of decreasing revenue and attacks on salaries and benefits. Commenter fears that the burden of this unfunded mandate will come from her salary like everything else that the General Assembly and the Governor refuse to fund. Commenter asserts that this initiative will not better prepare our students for their future but it will overburden our already overburdened schools.</p>	
<p>Susan Messier, CPA Tax Partner Goodman & Company</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Marsha E. Frith, CPA</p>	<p>Commenter supports a financial</p>	<p>Pursuant to overwhelming comment</p>

<p>Sells, Hogg & Jones, CPAs, PC</p>	<p>literacy program in the school system.</p>	<p>the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Charles A. Bish, CPA Bish & Haffey, PC (SOA Box)</p>	<p>Commenter urges the Board to require all students to take a high school personal finance and economics course to graduate.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Nick Hecker Thompson, CPA Senior Consultant Veris Consulting, LLC</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Mallard & Mallard CPAs, LLC</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	
<p>JoAnn M. Wicks, CPA Verizon Business - Finance</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Donald R. Pinkleton, CPA</p>	<p>Commenter supports requiring all high</p>	<p>Pursuant to overwhelming comment</p>

	<p>school students to take a course in economics and personal finance.</p>	<p>the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Joseph D. Thornton, CPA, ABV, PFS, CFP®, CVA <u>Mitchell, Wiggins & Company LLP</u></p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jennifer Kulper</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. • Include a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Beverly C. Boyer, CPA Sherman, Spero & Safarino, Ltd.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	
<p>Theresa K. Noe VP Strategic Planning HCA Healthcare - Capital Division</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>”</p>	
Brian Lee Christopher	<p>Commenter supports requiring personal financial literacy for high school graduation.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Patrice S. Elliott, CPA CIA Assistant Controller Department of General Services Commonwealth of Virginia (SOA Box)	<p>Commenter supports requiring literacy (personal finance AND economics) as a criterion for a high school diploma.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Michelle Calhoun CPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Robert C. Makin, CPA CFO The Dragas Companies	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in</p>

	<p>personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>economics and personal finance.</p>
<p>Forest Fowler Principal/CTE Director Giles County Technology Center</p>	<p>Commenter supports comments submitted at the public hearing on behalf of the Region VI Career and Technical Education Administrators group. Commenter agrees:</p> <ul style="list-style-type: none"> • The academic rigor of each diploma should be derived from the rigor required of the standard and advanced studies diplomas. • The technical rigor should be derived from the requirements for a student to be a CTE program completer with a minimum of 4 credits earned in a CTE program sequence. • That to eliminate confusion by students, parents, employers and post-secondary institutions the diplomas should be referred to as the Standard Diploma with a Technical Concentration and the Advanced Studies Diploma with a Technical Concentration. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>Commenter supports the requirement for a student to earn an industry certification, license or occupational competency assessment <i>but only after there are appropriate assessments available in all CTE program areas and these assessments and CTE competencies have been aligned.</i></p> <p>Commenter does not support the proposal to require 2 years of foreign language to earn a Standard Technical Diploma. Commenter believes the proposed requirements of the Standard Diploma to earn 1 credit in foreign language, economics or personal finance is sufficient and the student may take a second year of foreign language as an elective credit if they so desire. Any increase in the number of required credits to graduate makes it more difficult to schedule students in smaller schools.</p>	
<p>Alexander Diederich, CPA</p>	<p>Commenter supports the VSCPA’s comments regarding adding a financial literacy component to Virginia high school curriculums.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jamie Wohlert, CPA, CFE Navigant Consulting, Inc.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>Melody Barackman Controller Virginia Housing Development Authority</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Cameron W. Vaughan Chief Financial Officer The Wilton Companies</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>J. Chip Broadway, CPA, MBA Vice President & Treasurer Episcopal Church Schools in the Diocese of Virginia</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Susie Irvine Karen Klugh</p>	<p>The AFSA Education Foundation (AFSAEF), supports requiring students to pass a personal finance</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in</p>

	<p>course to graduate. The organization supports use of its free MoneySKILL® course, a 34-module curriculum which teaches the basics and complexities of personal finance in the content areas of income, expenses, assets, liabilities and risk management. This personal finance education could be available immediately to students' throughout the United States without any financial burden on the schools, teachers and students. Much more must be done. Schools should start teaching these personal finance concepts in the elementary grades. Commenter advocates for requiring an entire semester course be devoted to teaching these important life skills, starting in elementary school, continuing through middle school, and finishing in high school.</p>	<p>economics and personal finance.</p>
<p>Chad Ratliff</p>	<p>Commenter believes, at minimum, financial literacy should have the same level of importance as art, music, or physical education in our public schools. It's not unreasonable, however, to argue that it should even be considered part of core curriculum and included in standards-based testing. Commenter requests that the Board include a standalone personal finance course in the revised requirements for graduation.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>William Pouch Accounting Manager ION Healthcare Corporation</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p><i>OR</i> personal finance.</p> <ul style="list-style-type: none"> • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Vickie M Barrow Vice President - Investments Wachovia Securities</p>	<p>Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and personal finance classes for graduation requirements. Commenter supports school system having personal finance and economics as a core curriculum in all high schools</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Audrey Thomson (SOA Box)</p>	<p>Commenter supports changing Virginia's graduation requirements so that every student must pass a course in economics and personal finance as a condition of graduation.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Patti Quick</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>Bobby Grohs</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Robert A Krueger, CPA Alexander Randolph</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p><i>OR</i> personal finance.</p> <ul style="list-style-type: none"> • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. If a statewide graduation requirement in economics and personal finance is not feasible, for consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the VSCPA asks that language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” <p>Commenter believes that an economics and personal finance course should be listed as an option to replace the 4th year of math for students who are not interested in pursuing math and sciences further in their college or work careers.</p>	
<p>James E. Stewart, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<i>Arts or Economics and Personal Finance."</i>	
Darius A. Johnson SVP, Chief Lending Officer Consolidated Bank & Trust Co.	Commenter supports a requirement that all students complete a finance or economics class as part of their requirements for graduation	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Marsha S. Shuler Senior Vice President The Federal Reserve Bank of Richmond	Commenter urges the Board to <i>require all students</i> to earn a credit focused on both economics <i>and</i> personal finance.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Mary Muldoon, CPA	Commenter supports a requirement that all students complete a finance class as part of their requirements for graduation	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Barry L. Thomas	Commenter urges the Board to adopt a mandate for an economic class for all students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jeff Leopold	Commenter believes it is essential that the Board require an economics/personal finance course in high schools.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Karla S. Moran Group Controller Moog, Inc. Components Group	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and</i> Personal 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<i>Finance."</i>	
Susan Dewey, Executive Director, VA Housing Development Authority	Commenter urges the Board to make an economics and personal finance course a requirement for every high school student.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Katherine Busser Executive Vice President Capital One Financial Corporation	Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Walter Ayers	Commenter supports a mandated economics/financial literacy course.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Maria Rivero	Commenter stated "[t]"here should be high expectations for all students, not just students who are going for the standard or advanced diploma. Commenter asserts that special needs students should receive individualized instruction. Commenter asserts that for special education students to be successful colleges and workplaces need to recognize the modified standard diploma as being just as valuable as the standard diploma. Commenter requests that the Board increase the target for the graduation index to at least 90 points, or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials.	The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.
Mark L Endries Controller, Luck Stone Corporation	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<p><i>OR</i> personal finance.</p> <ul style="list-style-type: none"> • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Lorilei J. Roberts, CPA Manager PBGH, LLP</p>	<p>Commenter urges the Board to include as a requirement for graduation at least one credit that includes personal finance AND economics, and include such requirement for all graduates, those seeking advanced diplomas as well as those seeking the standard diploma.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Carol B. Whitson College of William and Mary</p>	<p>Commenter supports Governor tying graduation rates to school accreditation. Commenter asserts that currently challenging special education students are counseled out of the high school graduation track. Commenter recommends that the formula be increased from 80 points to 90 points for the graduation index. Commenter believes that students earning Modified Standard Diplomas are not counted by the state as high school graduates because they do not obtain a standard high school diploma. Commenter asserts that high schools should be able to include these students as graduates, and these students should be included in the index. Commenter agrees, in theory, with the proposed plan for middle school personal academic and career plans. Commenter feels these plans, if successfully done, will require a degree of reflection, communication, and evaluation that may not be possible within the current infrastructure of public schools. Commenter asserts that it is imperative that this plan not become just another required form that does not have strong evaluative data to predict student interests or ability, nor the linkages (community- based employment/internship opportunities)</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Students earning Modified Standard Diplomas are included in the graduation rate formula and will be counted in the index. The formula is $\text{Graduation rate} = \frac{[\text{On-time graduates in Year X}]}{[(\text{First-time entering ninth graders in Year X-4}) + (\text{Transfers in}) - (\text{Transfers out})]}$. While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level.</p>

	which are integral to garnering long-term student and family commitment.	
Olin V. Hyde	Commenter supports the recommendation from the Virginia Council on Economic Education that every high school student in VA have courses in economics and personal finance.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Christine W.Caskey, . Assistant Superintend Department of Curriculum and Instruction Virginia Beach City Public Schools	Virginia Beach City Public Schools supports the proposed revisions to the regulations however, the division has concerns regarding the time-line for implementation of the proposed diplomas and increased diploma requirements. The division asserts that the revisions will have a significant impact, including financial impacts, for school divisions. The proposed requirements for the technical diplomas will most likely result in an increase in teacher allocations for career and technical education, foreign language, personal finance, and economics courses. Most school divisions are currently finalizing budgets for the 2009-10 school year that are impacted by the economic downturn at the national, state, and local levels. Virginia Beach asserts that if implementation is required beginning next school year, then school divisions will have to make tough budgetary choices, despite the best interests of students, to comply with these new regulations. The proposed revision would also affect Virginia Beach’s alternating A/B block schedule. The new diploma requirements would force the division to implement alternate scheduling options that ensure students are able to meet new state criteria for graduation. Revisions to the current high school schedule will have significant impacts that involve not only the instructional program, but other areas such as staffing and transportation. Virginia Beach City Public Schools is supportive of the new requirements for the Advanced Studies and Standard diplomas and the implementation of the Standard Technical and Advanced Technical diplomas. The division requests the state department to delay the implementation of these new	The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.

	requirements from the ninth-grade class of 2009-10 to the ninth-grade class of 2010-11. This delay will allow school divisions additional time to address the staffing, scheduling, and fiscal impacts.	
S. Buford Scott, Chairman, Scott & Stringfellow, Inc.	Commenter urges the Board to require a course in economic and financial literacy for every student to graduate from high school.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
William C. Foote Officer Aronson & Company	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Rachel Powell	Commenter urges the Board to add at least a semester long economic/personal finance course requirement for graduation.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Larry Hurt, CPA member VSCPA	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement 	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	<p>can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	
<p>Timothy J. Kaczmariski Controller John C. Grimberg Co., Inc.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>Athena M. Robbins, CFP(R), CPA Carmines, Robbins & Company, PLC</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Gregory F. Lawson, CPA/ABV Senior Partner Goodman & Company, LLP</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
Dan Salandro School of Business VCU	Commenter requests that the Board require a course in economics AND personal finance not a course in economics OR personal finance.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Gray Rawlings Vice President Administration S&K Famous Brands, Inc.	Commenter is in favor of adding economics and personal finance requirements to the high school curriculum.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Tricia Neale, CPA Thompson, Greenspon & Co. PC	Commenter encourages the Board to require courses in economics and personal finance for high school graduates.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Gemma Kotula Director Christopher Newport University Center for Economic Education	Commenter feels that every student should be encouraged to have the basics of a sound financial future, and an understanding of how the economic forces of the world work. To benefit not only themselves but also every other citizen of the world.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Catherine W. Howard, Ph.D. Vice Provost, Division of Community Engagement Associate Professor, Psychology Virginia Commonwealth University	Commenter encourages the Board to include a credit on economics AND personal finance. This course should be an integration of content not a choice between the two areas required for ALL students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Tammy C. Woodcock	Commenter believes that the SOL may have started out as a good idea in theory, believes “these test have become the do all and be all of our education system.” Commenter believes children are no longer taught to think but just to memorize information. Commenter advocates teaching economics and basic math. And feels this is not the case currently. Children believe the SOL	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.

	and NCLB have their good points and bad points.	
Gladys Denzler	Commenter believes a course in economics and personal finance should be a high school graduation requirement.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Paul F. Kline	Commenter emphasizes the need for financial education at the high school level. Regardless of the direction students take after high school they will need personal financial literacy and an understanding of the underlying economic principles that govern the way our entire financial system works. Commenter requests that the Board require economics and personal finance not finance OR economics option as a one credit course for all diplomas.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Dr. Cecil Snead Director of Instruction Amy V. Cummings Coordinator of Social Studies Roanoke County Public Schools	It is the position of Roanoke County Public Schools that more time will be needed to implement the proposed standards, if approved, regarding Economics. The proposed Economics course would require the division to develop curriculum, review textbooks according to policy and procedure for doing so, and professional development for Social Studies staff in preparation for teaching the course effectively, all of which require the expenditure of funds which are short at this time. Roanoke recommends that more time be given before requiring an economics course for graduation to insure a thoughtful implementation.	The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.
Steven Zanetti, NBCT Douglas S. Freeman High School	Commenter supports requiring a course in economics and/or personal finance be taught as requirement for graduation. Commenter feels it is important to require both a semester in economics and a semester in personal finance. Commenter requests that the General Assembly consider a bill that requires that all public high school students be required to pass both a semester in economics AND a semester in personal finance for graduation.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Jason Mauney	Commenter urges the Board to require high school students to take at least one unit of credit in finance and economics.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.
Dominique Way	Commenter is upset regarding how the points are distributed for different	The Board chose not to amend the point value for the GED and other

	<p>credentials for the graduation and completion index. Commenter strongly disagrees with the point values for the Certificate of Completion, GEDs, and with other point values for the Advanced and Standard diplomas being the same. Commenter suggests that the points differ significantly between Advanced and Standard Diplomas. Commenter is concerned that under the current proposal we will increase our school to prison pipeline. Students will graduate from high school and not further their education and not be able to find long-term careers; which then leads them to other means of surviving and then to our prisons. Commenter believes increasing the target to 90 points using the existing index will be a major step up for students graduating from high school.</p>	<p>diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Katherine D. Smith, CPA State Controller USOncology</p>	<p>Commenter requests that the Board consider adding both an economics and personal finance course to the graduation requirements for high school students.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Linda Rogus Executive Director Shannon Tackett Communications Officer Northwest Federal Credit Union Foundation</p>	<p>Commenter requests that the requirements for the advanced studies diploma be reworded from “economics or personal finance” to “economics and personal finance.” Commenter requests that the requirements for the standard diploma be changed from a single requirement for “foreign language, economics, or personal finance” to two separate requirements for a foreign language and economics and personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Denise J. Jones 2008-2009 President Virginia Counselors Association Heidi B. Davis, Ed.S. Executive Director, Virginia Counselors Association Virginia Career Development Association</p>	<p>Virginia Counselors Association (VCA), and Virginia Career Development Association (VCDA), supports the proposal to require the development and maintenance of a personal Academic and Career Plan (SLCP) for each 7th -and 8th-grade student. However, any requirement for plans should be accompanied by state or local funding to accommodate the additional staff or resources, including the professional development, required to support this process. Funding and placement of career counselors, career specialists or career coaches in all high schools is also essential to the success</p>	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level.</p>

	<p>of the plans. Expanding this effort to the middle schools will require additional resources. Systematic training and professional development opportunities for counselors and other educators involved in the implementation are also essential.</p>	
<p>Jim Lee CPA/PFS</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Pompa Bose, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Monique T. Valentine, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Stephanie Saunders, CPA</p>	<p>Commenter requests that the Board:</p>	<p>Pursuant to overwhelming comment</p>

<p>Chair, VSCPA Educational Foundation Board of Directors</p>	<ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Lisa M. Murphy Attorney at Law LeClair Ryan</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<ul style="list-style-type: none"> • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Dana B. Hamel</p>	<p>Commenter supports the position of the Council on Economic Education and the article by Sarah Hopkins Finley about a proposal for adding economic and/or personal finance classes for graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Newport News Public School Career and Technical Education Department</p> <p>Barbara Smith-White Career and Technical Education Instructional Supervisor</p>	<p>Commenters support the amendments to the various diploma options that will ensure students are directed in the right pathways to college and/or pursue their career options including:</p> <ul style="list-style-type: none"> • The need for economics and/or personal finance education • The need to allow students to put emphasis on the career of their choice, whether they are going to college by allowing them to take more electives and required CTE courses. This will provide a more focused and structured system for all students to excel in their career goals and continue to be successful in their academic courses regardless of their IEP, class ranking or college/career interest. • The changes and addition to the diplomas with the inclusion of industry certification will make students more marketable to industry, more attractive to colleges and more career-oriented. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Dr. Robert G. Smith Superintendent Arlington Public Schools</p>	<p>Arlington Public Schools opposes changes to the Standard and Advanced Studies Diploma options related to foreign language, economics or personal finance, and the addition of the Standard and Advanced Technical Diplomas.</p> <p>Economics or Personal Finance Course</p>	<p>State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.</p> <p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. The changes in course and credit</p>

	<p>The Arlington social studies curriculum infuses the economic principles at both the middle and high school levels. Economics and financial literacy objectives and lessons are incorporated into the Grade 12 U.S. and Virginia Government course. Staff development was provided to every Arlington teacher of the U.S. and Virginia Government course. In addition, Arlington has a semester elective course, <i>Personal Finance/Money Management</i> and a full-year elective course, <i>Banking, Finance, and Investments</i>. The specific requirement of a personal finance or economics course as part of the 22 credits for the Standard Diploma and the additional requirement of a personal finance or economics course to increase the number of credits for an Advanced Studies Diploma is duplicative and does not best serve the needs of students. In addition, the creation of additional requirements in personal finance and economics will result in increased costs for textbooks, professional development, and staffing.</p> <p>Foreign Language Option The suggested change of the option of a required foreign language elective in lieu of the personal finance or economics elective to the Standard Diploma, does not best meet the needs of students. The division is troubled by the recommendation to increase the number of required courses to the Standard Diploma and add additional graduation requirements to the Advanced Studies Diploma. Students with disabilities and students whose native language is other than English are at particular risk for not graduating on time or for dropping out due to the additional requirements.</p> <p>Standard and Advanced Technical Diploma The division does not support the addition of two new diploma options, especially when students who take the</p>	<p>requirements continue to add rigor to student achievement as well as provide some flexibility. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out. State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.</p>
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	<p>additional four Career and Technical sequential courses are already eligible to receive the Career and Technical Education Seal. The seal's requirements are more rigorous than those of the proposed diploma. There are concerns around adding any additional diploma types in terms of the increased resources necessary to manage the multitude of diplomas and the potential for additional requests for other 'special diplomas.'</p>	
<p>Kenneth Stewart</p>	<p>Commenter believes that every high school student should have a curriculum requirement for a class that teaches basic economics and personal finance</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Howard B. Kiser Division Superintendent Gloucester County Public Schools</p>	<p>Gloucester County Public Schools is in opposition to the proposed changes to the graduation requirements. The division supports adding the Career Technical Diplomas within the confines of the existing requirements for a Standard and an Advanced Studies Diploma, but not if the requirements for the Advanced Studies Diploma are increased from 24 to 26. Especially now, when localities are faced with diminishing dollars to support current programs, it seems counterproductive to add mandates that will impact staffing, programs and overall costs to implement, especially since appropriate funding will not be provided to support the proposed changes. Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements at this time will have an adverse impact on staffing and support costs.</p>	<p>State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations. The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment. Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Barry D. Yost, Ed. D. Washington County Public Schools Supervisor Career & Technical Education, Adult Education, and Alternative Education</p>	<p>Commenter states that the addition of personal finance, economics, or foreign language as a graduation requirement would cause undo financial stress on some schools and</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. The Board has proposed to delay</p>

	<p>school divisions if funds are not allocated for the additional courses and/or sections. Commenter asserts that the CTE diplomas should have a credential completion for the diplomas. This will also require allocated funding at the state and federal level. These are trying economic times, and the Board needs to give strong consideration to any new proposals that would be an expense to the locality.</p>	<p>implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>William M. Wright, II, CPA President, Landmark Military Media, Inc.</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Steve Ritter</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>proposed for students by one unit of credit under the proposed diploma requirements.</p> <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Suzanne Gallagher, Director Center for Economic Education School of Business Virginia Commonwealth University</p>	<p>Commenter encourages the Board to require all high school students take a course in economics AND personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Edward J. Grenier III President and CEO Amy Marcenaro Heckman Vice President, Education and Strategic Partnerships Junior Achievement of the National Capital Area</p>	<p>Commenter urges the Board to:</p> <ul style="list-style-type: none"> • Include, at a minimum, one unit of credit in economics and personal finance as a requirement for graduation • Any required credit (even electives) should include a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Terry E. Zerwick CPA/PFS Zerwick & Associates PLLC</p>	<p>Commenter supports support of inclusion of a course on economics and/or personal finance as a required course for graduation.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Linda and Jim Greenhager</p>	<p>Commenter supports Sarah Hopkins Finley’s article about a proposal for adding economic and/or personal finance classes for graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>W. A. Dennison, Jr. City Manager City of Bristol</p>	<p>The graduation and completion index, the Academic and Career Plan for middle school students, and the</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the</p>

	<p>increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>	<p>additional planning time is needed and the challenges of the current economic environment.</p>
<p>Bonnie Johnson County Administrator County of Bath</p>	<p>The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. The new costs associated with the regulations will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>Ronald Lovelace, CPA Lovelace, Norvelle, Mathews, & Crews</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.”</p>	
<p>John Denison Cherry, Bekaert & Holland</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance</i>.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Toby Ellison Cherry, Bekaert & Holland</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	
<p>Wesley Watkins Cherry, Bekaert & Holland</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics <i>AND</i> personal finance, not economics <i>OR</i> personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics <i>and Personal Finance.</i>” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

<p>William T. Berry, Jr. Cherry, Bekaert & Holland</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics <i>and</i> personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Kurt D. Hodgen City Manager City of Harrisonburg</p>	<p>The graduation and completion index, the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>James D. Campbell</p>	<p>The graduation and completion index,</p>	<p>The Board has proposed to delay</p>

<p>Executive Director Virginia Association of Counties</p> <p>R. Michael Amyx Executive Director Virginia Municipal League</p>	<p>the Academic and Career Plan for middle school students, and the increase in other accreditation requirements will require additional staff time and resources at a time when there are cuts in state funding for virtually all programs. It is unlikely the General Assembly will fund any of the new costs associated with the proposed revisions so the costs will be borne by the local governments and local taxpayers. Commenter requests the Board not increase requirements at this point unless it eliminates other programs to offset the increased costs of the revisions, relax other, less critical standards or ties implementation to funding increases in the Standards of Quality.</p>	<p>implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>Dawn. C. Lindley, Director of Marketing and Financial Literacy, Virginia Credit Union League</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics and personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Locke Trigg Regulatory Compliance Analyst</p>	<p>Commenter urges the Board to amend the proposal to require all students, not</p>	<p>Pursuant to overwhelming comment the Board of Education amended the</p>

<p>Bureau of Financial Institutions</p>	<p>just advanced studies students to earn a credit focused on both economics <i>and</i> personal finance not economics or personal finance.</p>	<p>proposal to include one credit in economics and personal finance.</p>
<p>Ward R. Scull, III Michael H. Lane Virginians Against Payday Lending</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics and personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p> <ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.” 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Bradley S. Haun, CPA</p>	<p>Commenter requests that the Board:</p> <ul style="list-style-type: none"> • Include, at the minimum, one unit of credit in economics and personal finance as a requirement for graduation for all Virginia high school students. Commenter states that this new requirement can be accomplished by reducing the number of required electives proposed for students by one unit of credit under the proposed diploma requirements. <p>If a statewide graduation requirement in economics and personal finance is not feasible, then consider the following changes to the electives in the current proposal:</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<ul style="list-style-type: none"> • Include in any required credit (even electives) a course that incorporates both economics AND personal finance, not economics OR personal finance. • Include “personal finance” in the elective requirement verbiage for the advanced studies technical diploma. For consistency with the elective proposals in the standard diploma, advanced studies diploma and standard technical diploma, the language be amended for the advanced studies technical diploma to read “Fine Arts or Economics and Personal Finance.” 	
<p>Bobbie Gilbert – Business Teacher and CTE Team Leader, Waynesboro Public Schools</p>	<p>Commenter appreciated the support for the two new diploma options. Believed the Board needs to support the administrative tasks that will be involved with the new diplomas, i.e. recordkeeping, staff, and funding for the tracking of the diploma requirements. Concerned about the consistency of the course title needed for the Advanced CTE Diploma with the Economics course. Requested that it be called Economics and Personal Finance.</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment. Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Tom Garner – Virginia Bankers Association</p>	<p>Commenter wanted to put a “face” to the comments that had been provided by the Virginia Bankers Association. Supported the association’s request that the Board of Education include a course on economics and personal finance in all diploma tracks instead of just the Advanced Diploma curriculum so that all students take the course.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Sue Wright – Coordinator of Elementary Instruction, Waynesboro Public Schools</p>	<ul style="list-style-type: none"> • Expressed support for the proposed changes to the SOA, but stated that she did not believe they will have an impact on leading Virginia’s students into the 21st Century. • Stated that students need to be bilingual and that language instruction needs to be a standard at the elementary level. • Stated that if students have an academic and career plan at the middle school level, but graduate without the imagination and creativity to solve tomorrow’s problems, the plan will be futile. 	<p>Requiring foreign language and music at the elementary level would have a significant fiscal impact. The Department does not have the staff or resources to permit students to submit projects to the Department for evaluation. Grading and the awarding of credit are within the purview of the local school division.</p>

	<ul style="list-style-type: none"> • Proposed that all students become proficient in a musical instrument, or as part of a vocal ensemble, that students are allowed to show mastery of the SOL in an artistic form. • Also believed that students should be required to respond to instruction using technologies that would widen their audience by allowing interested students to submit an electronic project to the department based on a world problem. The student inventors or creators should be awarded a verified credit for their project and their solution should be shared. • Stated that public educators should evaluate the skills that students need for the problems that do not yet exist and put their energies there. • Stated that the proposed changes to the SOA will take money and time from educators and asked whether they will make a significant step in creating a public school system that can respond to the needs of the world. 	
<p>Christa Pierpont – Restorative Community Foundation</p>	<ul style="list-style-type: none"> • Supported Virginia’s efforts to make graduation rates a priority for Virginia high schools. • Requested that the Board of Education adjust the graduation and completion index so that it gives schools more points for Standard and Advanced Diplomas and fewer points for all alternative diplomas and other credentials. • Requested that the board provide incentives to school systems to examine their graduation rates for each class of students (by gender, ethnicity, social economic indicators, the educational level of parents, etc.) and a strategic plan to raise all classes of students to the same graduation rate level as the most successful class of students and in keeping with the new SOA. • Requested that prevention grants for evidence-based practices be provided to help schools meet the standards. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The</p>

	<ul style="list-style-type: none"> Encouraged the Board to provide leadership in a state commissioned study and provide funding for grassroots leaders in each school to learn more about restorative practices for both prevention and addressing disciplinary matters so that model projects could be undertaken and shared with the department. 	<p>graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Laurie McCullough – Director of Instruction, Waynesboro Public Schools</p>	<ul style="list-style-type: none"> Concerned that the required academic and career plan would divert already scarce resources away from time spent in conversation and consultation with students and their families at a time when the students are getting to know themselves as independent people with their own talents and interests and most need support, guidance and mentoring. Encouraged the Board to let go of this proposed mandate and give attention instead to helping schools meet the goal of a qualified career coach in every high school in the valley. Believed having a consistent graduation rate is a positive step, but encouraged the Board to make needed adjustments in the formula so that schools are not punished when they work hard to help hardworking students who want to succeed. 	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor’s initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level. The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Don Blanchard – ESL Teacher, Waynesboro Public Schools</p>	<ul style="list-style-type: none"> Opposed establishing a graduation and completion index that all schools with a graduating class would be required to meet in order to be fully accredited. Requested the provision of more resources for children living in poverty in order to improve the graduation rate instead of spending money to implement the graduation and completion index. Requested the allocation of more resources for children in the low socioeconomic group to give them more educational opportunities, more access to books, and increased assistance in the primary grades. Requested the provision of more 	<p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out. The Standards of Accreditation are for K-12 schools and do not address early intervention programs.</p>

	<p>early intervention programs from birth through elementary school to help guide parents and their children to make informed decisions about health care, diet, and the importance of reading.</p> <ul style="list-style-type: none"> • Remember there are a wide variety of reasons students fall behind. Don't lose sight of the bigger picture. Knowledge is most important, not how many years it took someone to graduate. • Supported measures to seriously address the dropout problem and advocates measures to help poor-performing students. Simply assigning an arbitrary point scale for accreditation will not solve the problem. Intervention measures are needed long before a student enters high school. Proposals focused at the high school level should reward schools for finding innovative ways to encourage students to stay in school. • Stated that to improve the graduation rate, the Board should focus its efforts on improving the lives of children. 	
<p>Martin Auville – Director of Career and Technical Education and Director of Guidance, Rockingham County Public Schools</p>	<ul style="list-style-type: none"> • Believed the proposal for an academic and career plan is an admirable one. However, this will require more guidance services. So if this standard is implemented, it should come with additional state funding for additional counseling staff. • Difficult for CTE administrators and counselors to support the Standard Technical Diploma and the Advanced Technical Diploma for four reasons: <ul style="list-style-type: none"> ○ Technical diplomas will be viewed as vocational track and the Advanced Studies Diploma will be described as the college bound track, thus continuing the barrier between vocational and college bound programs of studies. ○ The addition of two new diplomas will create 	<p>While the Board has continued to require the Academic and Career Plan as part of the Governor's initiative, school divisions have been given flexibility in the timeline for development, in the content, and in the personnel used. Furthermore, the Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed in order for sufficient resources to be available at the local level. State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.</p>

	<p>more issues for counselors in terms of explaining the diploma options and tracking student progress toward meeting the requirements for each. With the addition of these two diplomas, there will be nine choices for the completion of high school.</p> <ul style="list-style-type: none">○ Additional diplomas will require more services from school counselors who are already overburdened.○ It will be extremely difficult, if not impossible, for students who attend a regional technical center for three periods a day to schedule the required courses for the Advanced Technical Diploma. <ul style="list-style-type: none">● There is no need for the two new diplomas. The current Standard and Advanced diplomas, with the CTE seal, offer the same result. If technical diplomas must be offered, consider awarding them to the students who meet the current requirements for earning a CTE seal on the other diplomas, and then eliminate the seal.	
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<p>Billie-Jo Grant – Doctoral student at UVA doing research for Just Children</p>	<ul style="list-style-type: none"> • Believed that the GED point value gives too much weight to credentials that do not give students a fighting chance for future education and the work force. • Not advocating eliminating the GED and alternative credentials, but believes these credentials are far less valuable to students when it comes to college and workplace readiness and should not be given a point value set so close to our goals for Virginia education. 75 points is not an accurate point value for the GED on the Graduation and Completion Index. • Supports JustChildren’s platform and recommendations for improving the proposed graduation and completion index to ensure that we are striving to meet the highest standard possible. • Schools should get full credit only for Standard and Advanced Diplomas. • GEDs should remain options for students who would otherwise drop out, and schools should be given some credit for helping students achieve the GED. But, the final target for schools should be closer to the value of a diploma than to a GED. • Setting the target (80) points so close to the value of a GED (75) points may have the unintended consequence of tracking students into GED programs and less valuable diplomas who could earn a Standard diploma with the right supports and services. • The standard needs to be set at 95% to ensure that schools are encouraging students to graduate instead of settling for a GED. • Increase the target to 95 to promote diploma graduates and eliminate graduation gaps among student subgroups and/or lower the value of all non-diploma options to reflect the diminished opportunities they offer students. 	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
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<p>Petition 209 individuals in support Note- Seven individuals were listed twice as petition signers and 27 of the signatories also submitted individual written comments and/or spoke at one or the public hearings.</p>	<p>209 signatures were provided to support the comments of Just Children requesting that the Board:</p> <ul style="list-style-type: none"> • Increase the target to at least 90 points using the existing index and change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas; or • Keep the target at 80 points, but also change the index to add incentives for schools to support students to reach for Standard or Advanced diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion and • Require high schools to reach the goals, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students. 	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Julia Branch</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials. • Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma. • Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score</p>

		<p>as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Anjernette Bowens</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials. • Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma. • Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma. 	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Mary Hopson</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials. • Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma. • Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma. 	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Antoinett Reed</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the graduation and completion index so that it gives schools more points for Standard and Advanced diplomas and fewer points for all alternative diplomas or other credentials. 	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85</p>

	<ul style="list-style-type: none"> • Provide dropout prevention programs and more help for students to reach the goal of a Standard or Advanced diploma. • Hold schools accountable for the number of low-income students, children of color, and students with disabilities or limited English proficiency who achieve a diploma. 	<p>points.</p>
<p>Sabrina Jefferson</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Sarah Chappelle</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been</p>

	<p>weight all other options according to the value to the student after high school</p> <ul style="list-style-type: none"> Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Lshaunda Caisi</p>	<ul style="list-style-type: none"> Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. Provide dropout prevention programs. Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduation in the traditional</p>

		<p>four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Pia Irby</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>James Bullock</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85</p>

	<p>high school</p> <ul style="list-style-type: none"> Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Tamara Henry</p>	<ul style="list-style-type: none"> Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. Provide dropout prevention programs. Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools</p>

		<p>accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Dionne Wilson</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Robin Ballard</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a</p>

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<p>Angela May,</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Shanah James</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very</p>

	<p>gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials.</p> <ul style="list-style-type: none"> • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Tomorrow Page</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score</p>

		<p>as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Janine Scott</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Antoinette Smith</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other</p>

	<p>programs.</p> <ul style="list-style-type: none"> • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Cora Hayes</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students</p>

		<p>do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Denton Hayes</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points or adjust the index so that it gives schools more points for Standard and Advanced diplomas and fewer points for alternative diplomas and other credentials. • Provide dropout prevention programs. • Give full credit for the Standard and Advanced diplomas and weight all other options according to the value to the student after high school • Disaggregate graduation data in order to increase graduation rates for all of Virginia’s most vulnerable students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Joy Jackson – Public Housing Association of Residents (PHAR)</p>	<ul style="list-style-type: none"> • Supported Just Children’s platform to improve the numbers of Virginia’s high school students who graduate with a diploma. • Recommended that the new state standards encourage prevention programs and early help, such as tutoring and mentoring programs. • Recommended stronger school and family partnerships. • Expressed a need for fairness and stated that 13% fewer African- 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85</p>

	<p>Americans are receiving diplomas and that white students are twice as likely as black students to receive Advanced Diplomas.</p> <ul style="list-style-type: none"> Urged the Board to make sure that all students have improved graduation rates by setting targets for each of the at-risk groups and making sure that all students have the opportunities they deserve. If schools are not required to disaggregate data, then the overall performance of the full group often hides the graduation gaps for specific sub-groups. 	<p>points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Emily Dreyfus – Just Children, Parent</p>	<ul style="list-style-type: none"> Supports the Just Children platform and recommends strengthening the current graduation rate index. By enacting a more rigorous graduation index, the Board can help remedy the following problems: <ul style="list-style-type: none"> About one in five students doesn't earn a diploma after 4 years of high school. There are intolerable racial and economic disparities in graduation rates and in the types of diplomas awarded to students in the NCLB sub-groups. White students are about twice as likely as black students to earn an advanced diploma in four years. Fewer than half of the students with disabilities earn Standard or Advanced Diplomas, even though the majority of them do not have intellectual disabilities. Recommend including a rigorous 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools</p>

	<p>graduation index to help encourage more students towards Standard and Advanced diplomas, which will facilitate more collaboration between families and schools.</p>	<p>accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Robin Crowder, Division Superintendent, Waynesboro Public Schools</p>	<ul style="list-style-type: none"> • Recommended that the Board consider providing an online course in personal finance for no credit that students could take without having to fit it into their regular class schedule. Students would receive a certificate upon completion of the course. This program has worked well in Waynesboro. • No additional support staff members are offered to assist with the finance class. Does not believe there will be enough funds for local school divisions to hire an additional staff member to teach personal finance. Therefore, requested that this provision be postponed at this time. • Guidance counselors have knowledge about students going to college, but do not know as much about students going into the world of work. Recommended that the Board begin considering career coaches who could also assist parents and students who do not know how to access the educational system. 	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance for the standard, standard technical, advanced, and advanced technical diplomas.</p> <p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p> <p>Requiring career coaches would require additional resources.</p>
<p>Sarah Martin – CTE Administrator</p>	<p>The proposed Technical Diplomas lack rigor in the validation of knowledge and skills related to content and lack the rigor of the current Standard Diploma with a CTE seal. What is missing is a means to validate the students’ knowledge and skills. She recommends that the Standard Technical Diploma requires students, at minimum, to maintain a “B” average or better in the CTE courses and obtain an industry credential related to content.</p>	<p>The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students who seek the technical diplomas will also be eligible to seek the CTE seal.</p>
<p>John Ledgerwood – Virginia Association of Career and Technical Education</p>	<p>When the bill was signed, it was stated that the Technical Diploma should meet or exceed the current diploma requirements. The proposed Technical Standard Diploma does not. He recommends that the Board of</p>	<p>The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students</p>

	<p>Education (BOE) infuse the quality and validation insurances that currently exist with a CTE seal on a Standard Diploma. Also recommends restoring the six electives that are in the current Standard Diploma to the Standard Technical Diploma by requiring 23 credits overall. This would allow students to complete a two-three credit foreign language sequence and a career pathway.</p>	<p>who seek the technical diplomas will also be eligible to seek the CTE seal.</p>
<p>David Holleran – Superintendent for Mathews County</p>	<p>Educators in Virginia have met and exceeded the goals the BOE has established with inadequate State funding and a teacher work force with salaries well below the national average. As budget cuts as high as 20 percent are predicted for school districts, he urged the BOE not to pass any new mandates and relax others. Otherwise, education in Virginia will stall chasing unfunded mandates instead of focusing on instruction for the state’s children.</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>Jessica Thompson – Just Children</p>	<p>There are unacceptable performance gaps in Virginia’s graduation rates. Despite a 2008 overall on-time graduation rate of 81%, only 69.3% of disadvantaged students graduated on time. Minorities also graduated below the overall levels. There is a nearly 13 percentage point gap between White and Black students and a 15.3 percentage point gap between White and Latino students. She recommends raising the target to at least 90 points.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Sarah Geddes – Just Children</p>	<p>Encourages the BOE to raise the target for full accreditation from 80 points to 90 points and to reconsider the index to add incentives for schools to plan early and support students in achieving their full potential. She also submitted Just Children recommendations:</p> <ul style="list-style-type: none"> • Increase the target to at least 90 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and</p>

	<p>points using the existing index; and</p> <ul style="list-style-type: none"> • Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas; • Or • Keep the target at 80 points; but also • Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion; and • Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students. 	<p>completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Joyce Beamon – Norfolk Public Schools</p>	<p>On behalf of Norfolk Public Schools, she supports the following recommendations of the Virginia Association for Career and Technical Education:</p> <ul style="list-style-type: none"> • That Technical Diploma options include the requirements for a CTE seal and opportunities for dual enrollment credit with community colleges. • That, whenever possible and appropriate, work force readiness skills and industry credentials or assessments are a recognized component of the Technical Diploma and Advanced Technical Diploma. 	<p>The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students who seek the technical diplomas will also be eligible to seek the CTE seal.</p>
<p>Lynne Mallory-Winter Edgewater Asset Management and board member of VCEE</p>	<p>Urged the Board to make an economics and personal finance course required for high school graduation as these are skills that will change students’ lives. Students will have the opportunity to protect</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

	<p>themselves and increase their own productivity in whatever endeavor they set for themselves. Most states have a required course for high school graduation.</p>	
<p>Joseph Johnson - New Horizons Regional Education Center</p>	<p>Supports the development of the technical diplomas. He suggests that we clarify “CTE courses” by changing it to read “credits in CTE courses.” He also suggests that we change “CTE concentration” to “career pathway.”</p>	<p>Career pathways and concentrations will be addressed in the SOA guidance document.</p>
<p>Glen Birch - Virginia Credit Union</p>	<p>Implement a one credit requirement for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Linwood Christian - Petersburg Advocates for Children/Parent</p>	<p>Many parents in Petersburg care passionately about the future of their children and attention to graduation rates is long overdue. Supports the Just Children recommendations:</p> <ul style="list-style-type: none"> • Increase the target to at least 90 points using the existing index; and • Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas; • Or • Keep the target at 80 points; but also • Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion; and • Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>

	<p>students.</p> <ul style="list-style-type: none"> Require achievement in at-risk subgroups and eliminate the graduation gaps. 	
Tarrika Brown (Letter) - Student, Petersburg High School	<p>Glad the Board is proposing to add graduation rates to the SOA but needs to do more. Way too many students in Petersburg are being told they should just get a GED. GEDs are good for some students but they should not be the main option. Certificates of completion are practically useless. The proposal sends a message that it is OK for large numbers of students to leave school without a diploma. That's not right.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that "[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma."</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
John M. Carter - Parent/Virginia Council on Economic Education (Public Hearing)	<p>Implement a one credit requirement (year-long course) for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Tina Lambert - Virginia Society of CPAs/Virginia JumpStart	<p>Implement a one credit requirement for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students. Include personal finance as an elective for the</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>

<p>Frances Patterson - Substitute Teacher/Petersburg</p>	<p>advanced technical diploma.</p> <p>Wants to start a non-profit organization to support students in danger of dropping out. Supports the Just Children proposals to:</p> <ul style="list-style-type: none"> • Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion; 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Andrew Schoeneman - Just Children Legal Aid Justice Center</p>	<ul style="list-style-type: none"> • Increase the target to at least 90 points using the existing index; and • Change the index to add incentives for schools to support students to reach for Standard or Advanced Diplomas; <p>Or</p> <ul style="list-style-type: none"> • Keep the target at 80 points; but also • Change the index to add incentives for schools to support students to reach for Standard and Advanced Diplomas; and • Change the index to reduce the points awarded to schools for GEDs. The final target (80 points) is closer to the points awarded for a GED (75 points) than a Standard or Advanced Diploma (100 points); and • Change the index to significantly reduce points awarded to schools for certificates of program completion; and • Require high schools to reach the goal, or make significant and sustained progress, for economically disadvantaged students, students with disabilities, students with limited English proficiency, and minority students. 	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to</p>

<p>Courtney Fleming - Virginia Bankers Association</p>	<p>Implement a one credit requirement (year-long course) for all Virginia high school students in Economics <u>and</u> Personal Finance. Too many citizens are misinformed about finances. Economics and personal finance go together and should be mandatory for all students.</p>	<p>prevent students from dropping out. Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Linda Moore - A Voice for GAP Kids</p>	<p>The SOA draft doesn't go far enough. It doesn't address: Drop-out prevention – schools should be rewarded for keeping students engaged in school. Diplomas – gives full credit for credentials that don't offer full opportunities. GEDs, certificates, special diplomas and modified standard diplomas are not as highly valued in the world of work. Only standard and advanced studies diplomas should carry full credit. Other options should be weighted according to their value to the student. Disaggregation – disaggregating graduation data about Virginia's most vulnerable students is key to ensuring success for all.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that "[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma." The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Elle Merkle - The P.L.A.C.E. Group (Parent Leaders Advocating for Children's Education)</p>	<p>Would like to see the new standards address: Drop-out prevention – schools should be rewarded for keeping students engaged in school. Diplomas – gives full credit for credentials that don't offer full opportunities. GEDs, certificates, special diplomas and modified standard diplomas are not as highly valued in the world of work. Only</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that "[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma." The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has</p>

	<p>standard and advanced studies diplomas should carry full credit. Other options should be weighted according to their value to the student. Disaggregation – disaggregating graduation data about Virginia’s most vulnerable students is key to ensuring success for all. Also, recommends adoption of the Just Children proposal.</p>	<p>been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Tarcis White - Legal Aid Justice Center</p>	<p>Would like the Board to take a stronger stand on promoting graduation by: Reward schools that keep students engaged and implement retention programs to reduce dropouts. Do not give full credit for credentials that do not offer full opportunities (i.e., GED, Certificates of Program Completion, Special Diplomas, and Modified Standard Diplomas.) Help increase graduation rates for Virginia’s most vulnerable students and disaggregate graduation data for these students. Expressed concern for students of low-income parents. Supports Just Children proposal.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation</p>

		<p>and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Sean McKenna, Pediatrician - Legal Aid Justice</p>	<p>Supported comments from the Legal Aid Justice Center. Also, cited statistics that show a correlation between health, insurance rates, income and gaps in on-time graduation rates and drop-out rates.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Emma Yackso (Letter) Charlottesville High School Student</p>	<p>The Board’s current proposal endorses low expectations. Schools could encourage students into lower-achieving programs and still meet the graduation targets. She has witnessed many students because they were not encouraged by the school system, who have not lived up to their academic potential. Also, the proposal includes no plan to close the gap in graduation rates for racial and socioeconomic groups. The draft must be amended in order to provide each student with the best academic experience possible.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide</p>

		<p>accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>John Vencie, III, CPA Virginia Society of Certified Public Accountants</p>	<p>The requirements for graduation should include, at a minimum, one unit of credit in economics <u>and</u> personal finance. Any required credit should include a course that incorporates both economics and personal finance. Personal finance should be reflected in the elective requirements for the Advanced Studies diploma.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Jack D. Dale, Superintendent Fairfax County Public Schools</p>	<p>The addition of the economics or personal finance option will place a burden on school divisions during a time of unprecedented budget reductions. There could be an additional burden placed on Advanced Placement (AP) or International Baccalaureate (IB) diplomas. The financial literacy objectives could be blended with Fairfax County’s existing American Government course to alleviate this burden. The proposed requirements for the technical diplomas are less rigorous than the requirements of the Career and Technical Education Seal that is currently available. Because of the absence of rigor and because of the short-term and long-term ramifications of adding two new diplomas, Fairfax County Public Schools (FCPS) cannot support the two technical diplomas. There are concerns regarding the 26 credit requirement for the Advanced Studies diplomas. FCPS high school students currently operate on a seven-</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations. The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students who seek the technical diplomas will also be eligible to seek the CTE seal. The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>

	<p>period day, which allows students to earn up to 28 credits. With budget constraints, this situation and other instructional areas may be scrutinized. If FCPS had to return to a six-period day, then only students enrolled in high-school courses at the middle-school level could earn the 26 credits.</p>	
<p>Byron Hinton, Chairman – Stafford Career and Technical Education Committee</p>	<p>The proposed Technical Diplomas lack rigor. This is not the time to “dummy down” expectations, given that more students are seeking technical backgrounds and given the emphasis on Science, Technology, Engineering, and Mathematics (STEM). The committee supports the proposal put forward by the Virginia Association of Career and Technical Education, which supports higher mathematics, history, social sciences, and foreign languages.</p>	<p>The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students who seek the technical diplomas will also be eligible to seek the CTE seal.</p>
<p>Cecilia Kuhn – Representing Self</p>	<p>The commenter supports education in personal finance and economics. Financial literacy is needed for youth.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Joe Clement – Representing Self</p>	<p>Economics education is important. An easy answer to providing economics education is to have an end-of-course Government test that incorporates economics principles. Commenter supports Dr. Dale’s comment to blend government coursework with financial literacy. There is room for providing a semester of economics in existing government courses.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Dorothy Schoeneman Representing self</p>	<p>Commenter supports the Just Children proposal. Commenter supports the use of a graduation and completion index. Diplomas, not credentials, lead to higher achievement.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for</p>

		<p>accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Nancy Tubbs – Legal Services of Northern Virginia (LSNV)</p>	<p>LSNV supports the graduation and completion index proposed by the Virginia Board of Education. LSNV requests that the Board reconsider its target of 80 points and/or the index. The target is set too low relative to the point values of various diploma options. The target should be raised from 80 to 90 or the mix of points needed to achieve the target should be changed. LSNV also requests that the Board require high schools to make significant yearly progress in raising the graduation rate for every at-risk subgroup of students.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Elizabeth Schneider – Representing Self</p>	<p>Commenter supports the graduation and completion index. The proposal would bring greater alignment to state accreditation and federal</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced</p>

	<p>accountability systems. Commenter cited the Louisiana Board of Education’s adoption of a Graduation Index as an example of a system that rewards schools for keeping all students enrolled and ensuring that they graduate and do not drop out. Because of unintended consequences, the commenter has asked the Virginia Board of Education to give additional thought to some of the details of the index. Disaggregation by subgroup is needed so that there are incentives for students to succeed. The commenter supports the Just Children proposal to modify the index to give less weight to GEDs.</p>	<p>Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Liane Rozzell – Families and Allies for Virginia’s Youth</p>	<p>The assignment of 75 points to the GED in the proposed graduation and completion index gives schools an incentive to track students toward a GED, even when they could earn a diploma. Expectations and incentives for diplomas should be raised. The accreditation standards should require schools to disaggregate graduate data. This will give schools a greater ability to target supports to struggling students. The current graduation and completion index sets expectations too low.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.” The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points. Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes. The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-</p>

		<p>accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
<p>Jennifer Platt – Representing Self</p>	<p>Commenter supports an economics/personal finance requirement in high school. Commenter urges careful consideration of the graduation and completion index and college preparatory programs because of the implications toward mediocrity influencing the under-achieving student subgroups.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Edgar Aranda – Legal Aid Justice Center</p>	<p>Commenter supports the concept of the graduation and completion index. The graduation rate data need to be disaggregated by subgroup as an incentive for schools to raise graduation rates. The graduation and completion index gives too much weight to GED and Certificates of Completion. The commenter supports the Just Children platform.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to</p>

<p>Brenda Long- Virginia Association for Career and Technical Education (VACTE)</p>	<p>The proposed Standard Technical Diploma requirements do not exceed the Standard Diploma requirements. It should not be a lesser than diploma. With the proposed Standard Technical Diploma a student with such a diploma enrolling in a community college would likely be required to enroll in remedial math courses to meet placement requirements. The proposed Standard Technical Diploma requires four CTE credits but does not require a career concentration or specialization. VACTE recommends the diploma include course requirements that meet a CTE concentration or specialization, requirements for the CTE seal, requirements for an industry, credential or assessment, and that the student become a CTE completer. VACTE recommends the following credit requirements for the Standard Technical Diploma:</p> <ul style="list-style-type: none"> English – 4 standard credits; 2 verified credits Mathematics - 3 standard credits;1 verified credit History and social science – 3 standard credits; 1 verified credit Health and physical education - 2 standard credits Foreign language – 2 standard credits with curriculum based on conversational language for work force readiness. Science – 3 standard credits; 1 verified credit; courses include chemistry, biology, and the third science related to the CTE pathway. CTE – 4 standard credits; courses must include a career concentration or specialization. For concentrations that require less than four courses students must complete additional courses that are related to the career concentration. Students must complete a CTE program sequence and pass an examination or occupational competency assessment in a CTE field that confers certification or an 	<p>prevent students from dropping out.</p> <p>The proposed amendments provide that if a career concentration includes a specific assessment approved by the board and the student is eligible to take the assessment, then the student must take this assessment. Students who seek the technical diplomas will also be eligible to seek the CTE seal. The Standard Technical Diploma would require:</p> <ul style="list-style-type: none"> English, 4 standard credits, 2 verified credits Mathematics 3 standard credits, 1 verified credits Laboratory Science 3 standard credits, 1 verified credits History and Social Sciences 3 standard credits, 1 verified credits Health and Physical Education 2 standard credits Fine Arts or Foreign Language 1 standard credit Economics and Personal Finance 1 standard credit Career and Technical Education 4 standard credits Electives 1 standard credit Student Selected 1 verified credit Total 22 standard credits, 6 verified credits <p>The Advanced Technical Diploma would require:</p> <ul style="list-style-type: none"> English, 4 standard credits, 2 verified credits Mathematics, 4 standard credits, 2 verified credits Laboratory Science, 4 standard credits, 2 verified credits History and Social Sciences, 4 standard credits, 2 verified credits Foreign Language, 3 standard credits, Health and Physical Education, 2 standard credits, Economics and Personal Finance, 1 standard credit Fine Arts or Career and Technical Education, 1 standard credit Career and Technical Education, 3 standard credits, Student Selected Test, 1, standard credit Total, 26 standard credits, 9 verified credits
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	<p>occupational competency credential from a recognized industry or trade or professional association or acquire a professional license in a CTE field.</p> <p>Electives – 2 standard credits Student selected assessment – 1 verified credit</p> <p>CTE seal would be required and would be awarded to students who earn either the Standard Technical Diploma or Advanced Technical Diploma.</p> <p>Advanced Math or Technology seal would be awarded to students who earn Standard Technical Diploma or Advanced Technical Diploma.</p> <p>Dual credit with post secondary where applicable</p> <p>Academic Career Plans would utilize career pathways beginning in middle school to high school to post secondary.</p> <p>Standard credits total = 23; Verified credits total = 6</p> <p>VACTE recommends the following credit requirements for the Advanced Technical Diploma:</p> <p>English – 4 standard credits; 2 verified credits Mathematics - 4 standard credits; 2 verified credit History and social science – 3 standard credits; 2 verified credit Health and physical education - 2 standard credits Foreign language – 3 standard credits with curriculum based on conversational language for work force readiness. Science – 4 standard credits; 2 verified credit; courses include chemistry, biology, and the third science related to the CTE pathway. CTE – 4 standard credits; courses must include a career concentration or specialization. For concentrations that require less than four courses students must complete additional courses that are related to the career concentration. Students must</p>	
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	<p>complete a CTE program sequence and pass an examination or occupational competency assessment in a CTE field that confers certification or an occupational competency credential from a recognized industry or trade or professional association or acquire a professional license in a CTE field.</p> <p>Electives – 2 standard credits Student selected assessment – 1 verified credit</p> <p>CTE seal would be required and would be awarded to students who earn either the Standard Technical Diploma or Advanced Technical Diploma.</p> <p>Advanced Math or Technology seal would be awarded to students who earn Standard Technical Diploma or Advanced Technical Diploma.</p> <p>Dual credit with post secondary where applicable</p> <p>Academic Career Plans would utilize career pathways beginning in middle school to high school to post secondary.</p> <p>Standard credits total = 23; Verified credits total = 6</p>	
<p>Barbara Taylor-Center for Economic Education at Virginia Tech</p>	<p>The proposed revisions should require that all students take economics and personal finance not just students seeking an advanced diploma. The proposed revisions should require a year long economics and personal finance course. The language should not provide for economics or personal finance.</p> <p>Supports Sarah Hopkins Finley’s article about a proposal for adding economic and personal finance classes for graduation requirements.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Melinda Robinett – Director of Special Education for Wythe County Public Schools</p>	<p>For special education students, IEP teams, not schools determine the student’s diploma tracks. The weighted points for diplomas penalize schools that do not make the diploma track decision.</p> <p>Special education students have an emphasized role in transition planning. The weighted points for diplomas penalize schools that do not make the</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>

	<p>diploma track decision. The weighting of diploma status also creates an unnecessary tension with other DOE identified initiatives. The IEP does not dictate testing modifications and accommodations for the GED. Separate justification must be submitted to GED test officials who make the decision about allowable test accommodations.</p> <p>The weighted points penalize schools for student and family choices. GEDs should not be weighted less than the Standard Diploma. For the state special education performance plan only standard or advanced studies diplomas are terminal degrees. This means all other exit degrees are counted as zeros and factored into the indicator percentage report as zeros. The result is the calculation for the indicator is artificially lowered. The 75 points for GED is an additional penalty for the same “perceived crime.”</p>	
<p>LaDonna Meade – Director of Instruction, Wythe County Public Schools</p>	<p>A GED is not a perfect solution but it may be the only solution for some kids, and some parents insist on a GED despite being advised of the importance of a diploma. Schools should not be penalized for GEDs as under the proposed revisions. The GED changed in 2002 and is now harder. Reconsider 75 points for GED earners, and view them as diploma earners at 100 points.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
<p>Rick Weaver – CTE supervisor, Montgomery County Public Schools</p>	<p>To make the new diploma options attractive to students and parents and to ensure they are understood by colleges, universities, and business and industry the diplomas should be referred to as the Standard Diploma with a Technical Concentration and Advanced Studies Diploma with a Technical concentration. Also adding the name of the CTE concentration to the diploma would add further value. The academic rigor of the technical diplomas should mirror the Standard and Advanced diplomas. Asking parents to choose between an Advanced Studies Diploma and an Advanced Technical Diploma is not wise, and will continue to advance the notion that technical education and</p>	<p>State law enacted by the Virginia General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.</p>

	academics are an “either or” proposition rather than a combination for success.	
Buckey Boone – Southwest Virginia Legal Aid Society	<p>Raise the 80 point base on the graduation and completion index in the near future to challenge schools to do better.</p> <p>Examine the weighted points for GEDs and Certificates of Completion because they may encourage schools to channel students into these options. If the percentage of GEDs and Certificates of Completion increase after the change is implemented then the weight should be lowered.</p> <p>Make greater use of the data that is now available to evaluate schools, to not only analyze schools’ performance by the type of diploma but also by categories of students.</p> <p>Schools should be pushed to graduate more students with an advanced studies diploma and encourage them to succeed with all groups of students.</p> <p>The Board should develop a formula that will encourage and reward schools that not only improve their graduation rates but also improve the rate of advanced studies diplomas and decrease the discrepancy between the overall rates and the rates for low income students or students with disabilities.</p> <p>Reconsider the requirement for three years of foreign language for the Advanced Technical Diploma. This requirement may preclude some students from attempting this degree even though they are taking rigorous CTE programs because they do not have the academic time or inclination to take a foreign language.</p>	<p>The Standards of Accreditation state in 8VAC 20-131-50 D.1 that “[e]very student shall be expected to pursue a Standard Diploma or Advanced Studies Diploma.”</p> <p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p> <p>Data are currently disaggregated for calculating Adequate Yearly Progress, which is part of the state-wide accountability system. While not a requirement placed in the regulations the data are also be disaggregated for accreditation reporting purposes.</p> <p>The regulations now include a graduation and completion index score as a basis for an accreditation rating, along with test score data and pre-accreditation requirements. The graduation and completion index provides for situations where students do not graduate in the traditional four years. Schools receive credit for keeping students in school and preventing dropouts. The graduation and completion index holds schools accountable for all students and recognizes successful efforts to prevent students from dropping out.</p>
Hank Bostwick-Legal Aid Society of Roanoke Valley.	<p>Concurs with Melinda Robinette’s comments.</p> <p>The primacy on IEP team decisions on diplomas and the points of the index may be contrary to that decision making authority.</p> <p>Revise the points for GEDs. The proposed points will cause students to be diverted into GED tracks.</p> <p>Certificates of completion preclude rural and inner city kids from joining the military.</p>	<p>The Board chose not to amend the point value for the GED and other diplomas in the graduation and completion index. However, the point value for the certificate has been lowered while the index target has been raised from 80 points to 85 points.</p>
Curtis Hicks – Region IV CTE	To make the new diploma options	State law enacted by the Virginia

<p>Administrators, Virginia Association of Career and Technical Administrators</p>	<p>attractive to students and parents and to ensure they are understood by colleges, universities, and business and industry the diplomas should be referred to as the Standard Diploma with a Technical Concentration and Advanced Studies Diploma with a Technical concentration. Also adding the name of the CTE concentration to the diploma would add further value. The academic rigor of the technical diplomas should be derived from the rigor required in the Standard and Advanced diplomas. The technical rigor should be derived from the requirements for a student to be a completer in a CTE area in addition to the requirements for certification in their area of specialization. Asking parents to choose between an Advanced Studies Diploma and an Advanced Technical Diploma is not wise, and will continue to advance the notion that technical education and academics are an “either or” proposition rather than a combination for success.</p>	<p>General Assembly requires the Board of Education to create the two additional diplomas contained in the regulations.</p>
<p>C. Wayne Adkins Member City of Salem School Board</p>	<p>Commenter urges the Board to require all students to take a high school economics and personal finance course and include such a course in all diploma tracks. All students should be required to complete at least a semester course in financial literacy basics prior to graduation. Financial literacy and economics should not be an elective. School divisions should have flexibility in meeting financial literacy requirements by including in the regulations a one credit unit course in economics and personal finance, a one-half credit unit in economics and a one-half credit unit in personal finance or a one-half credit unit in personal finance and a one-half credit unit in an advanced study of personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Alan Siebert – Superintendent, Salem City Public Schools</p>	<p>Requests that identical language is used regarding the requirements in each diploma type. Requests that flexibility in meeting financial literacy requirements be granted as to whether a one credit course or a combination of one-half</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance. Teacher licensure requirements will be addressed in guidance and licensure and course work requirements.</p>

	<p>credit courses be permitted to meet the requirement.</p> <p>Requests that for new requirements there be flexibility regarding teacher licensure codes permitted to teach these courses.</p> <p>Financial literacy skills should be required for all children; provided with a coherent course sequence; and that local school divisions should have reasonable flexibility in establishing, naming, and staffing courses.</p>	
<p>Alan Hawthorne – Executive Director, Joint Industrial Development Authority of Wythe County (Did not speak at the hearing but provided written comment.)</p>	<p>Supports the efforts of the Board to enhance CTE through development of the technical diplomas that enhance the value of technical education and ensure rigor in the preparation for a technical career.</p> <p>Encourages the inclusion of a credit requirement that includes the option for economics or personal finance courses.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
<p>Poquoson City Public Schools-Kerry Knowlton Chair of School Board</p>	<p>The division recognizes the value of the revisions. Requests postponement of the new regulatory requirements until the 2009-2010 fiscal year.</p> <p>Expressed concern about finding funds for new courses and the additional work for staff during a difficult period. A reduction in force may become necessary due to budget cuts resulting in staff having larger work loads in addition to adding the work of new regulatory requirements. With limited staff and limited resources existing programs may be at risk. The new regulations will add costs to school divisions both in terms of dollars and staff time. It does not make sense to add to the current budget crisis by asking school divisions to do more with less funding.</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>
<p>Alleghany County Public Schools – Randall Tucker, Chair of School Board</p>	<p>Requests the Board of Education to work with the General Assembly to postpone approval and/or implementation of the revised SOA, and to evaluate the appropriateness of all SOA requirements in light of budget reductions. Those regulations that provide sanctions against school divisions should be suspended until the state is able to fulfill its obligation to support at least 50 percent of the prevailing costs for all requirements. While it supports the revisions, the</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>

	<p>division notes that they will require additional staff time and resources at a time of significant state reductions in basic aid to public education. Without new funding the revisions result in unfunded mandates. Also requests postponement of the revised mathematics Standards of Learning until 2010 or until adequate funding is provided for staff development and new text materials. Requests the Board to send a letter to the U.S. Secretary of Education requesting an executive order suspending the No Child Left Behind’s four point increase in average measurable objectives.</p>	
Wesley Robinson	<p>Objects to the revisions to the Special Education Regulations.</p>	<p>This comment should have been submitted during the public comment period for the special education regulations.</p>
Kevin Carey	<p>Supports a course in economics and financial literacy.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
R. Darryl Holland, President Virginia Association of Agricultural Educators	<p>Supports adding units, lessons, or competencies in economics and personal finance into existing curriculum rather than requiring a new one credit course. If a new course is required commenter suggests including “all aspects of industry” in such a course and removing it from the career and technical education area.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
William Brune	<p>Supports a course requirement in economics and personal finance.</p>	<p>Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in economics and personal finance.</p>
Tammy Greggs	<p>Objects to the lack of funding for public education in Gloucester County.</p>	<p>Funding issues/concerns must be addressed with the General Assembly.</p>
King William County Public Schools- Mark Jones, Superintendent	<p>Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements at this time will have an adverse impact</p>	<p>The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.</p>

	on staffing and support costs. The division also objects to increasing the credit requirements for the Advanced Diploma from 24 to 26.	
Roanoke County Superintendent, Lorraine Lange, Superintendent	Requests that the Board postpone the proposed revisions specifically pertaining to graduation requirements until the financial outlook is better able to support costs for adding new courses. Students should be allowed to obtain CTE diplomas only within the confines of the elective requirements that are part of the current standards and advanced diplomas. Adding economics and personal finance is needed but increasing graduation requirements will have an adverse impact on staffing and support costs.	The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.
Superintendents' Study Group Region 2- Isle of Wight, Accomack, Franklin, Newport News, Poquoson, Southampton, Virginia Beach, York, Chesapeake, Hampton, Norfolk, Northampton, Portsmouth, Suffolk, and Williamsburg-James City.	The superintendents of the Region 2 school divisions request that the board delay proposed changes to the Standards of Accreditation and the Standards of Quality that are not being fully funded by the General Assembly. The superintendents support additional positions and increased rigor but request that the proposal be delayed until the economy improves. They request postponement of implementation of any unfunded mandates until the General Assembly provides sufficient funding to enable divisions to meet increased accountability standards.	The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.
Newport News Public Schools – Ashby Kilgore, Superintendent	The proposed amendments will require additional staff time and resources when, due to the revenue shortfall it is unlikely the state will provide its share of funding for new programs. Adding new requirements with budget reductions may cause effective programs to be lost. The question of costs needs to be answered before proceeding any further with the proposal. The division urges the Board to take great care in establishing another requirement for accreditation such as the graduation and completion index. Students who stay in school should receive more points than a student that earns a GED.	The Board has proposed to delay implementation of the requirements for another year, recognizing the additional planning time is needed and the challenges of the current economic environment.
Danville Regional Foundation Board of Directors	Supports economics and financial literacy for all students.	Pursuant to overwhelming comment the Board of Education amended the proposal to include one credit in

		economics and personal finance.
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Enter any other statement here

All changes made in this regulatory action

Please detail all changes that are being proposed and the consequences of the proposed changes. Detail new provisions and/or all changes to existing sections.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
20-131-5		Provides definitions of terms	Proposed language adds the two new diplomas, Standard Technical and Advanced Technical, to the list of diplomas included in the definition of graduate.
20-131-30		Sets expectations for students who must be tested in grades K-8	Proposed language clarifies that students shall be required to take only one test per content area in each tested grade. This language is proposed to eliminate any double testing of advanced students in content areas and to reduce the testing costs to the state associated with double testing.
20-131-50		Sets graduation requirements and honors.	<p>New language makes the requirements effective with the ninth-grade class of 2010-2011.</p> <p>One credit in economics and personal finance would be required for the Standard, Standard Technical, Advanced Studies, and Advanced Technical Diplomas. The original language provided for economics or personal finance.</p> <p>Foreign language was added to the Standard Diploma option of two standard credits in fine arts or career and technical education.</p> <p>Language was added to the Standard Diploma footnotes regarding the sequence of science courses.</p> <p>Footnote seven was added to the Standard Diploma.</p> <p>Other changes were made to footnotes to make them consistent.</p> <p>In the Standard Technical Diploma the number of electives was reduced from two to one to provide for one credit in economics and personal finance while maintaining a requirement for one credit in</p>

			<p>fine arts or foreign language.</p> <p>In the Advanced Technical Diploma the requirement for one credit in fine arts, economics, or career and technical education and one credit in personal finance was changed to one credit in fine arts or career and technical education and one credit in economics and personal finance.</p> <p>Language regarding eligibility was added to the footnotes requiring career concentration assessments.</p> <p>The term “probability” was added to the footnotes for the Modified Standard Diploma to correct the title of the statistics and probability course.</p>
20-131-60		Establishes provisions for handling students who transfer into public schools.	<p>Language is added to require that credits earned through Virtual Virginia, the online program, would be accepted in Virginia public schools. Language is added to require that the State Testing Identifier (STI) for students who transfer into a Virginia public school from another Virginia public school shall be retained by the receiving school.</p>
20-131-80		Establishes program of instruction and learning objectives for elementary schools.	<p>Language requiring use of a form prescribed by the Board of Education is stricken. A prescribed form by the state is no longer needed.</p>
20-131-100		Establishes program of instruction and learning objectives for secondary schools.	<p>Minimum course offerings are changed to reduce electives from 4 to 3 and provide for economics and personal finance.</p>
20-131-140		Establishes provisions for college and career preparation programs and opportunities for post secondary credit.	<p>An Academic and Career Plan for students beginning in grade seven is proposed at the Governor’s request.</p> <p>The Academic Career Plan would become effective with seventh graders in 2010-2011.</p> <p>The development timeline is extended throughout the student’s seventh-grade year with completion required by the fall of the eighth-grade year.</p> <p>The Board of Education will establish guidelines for development of the Plan.</p> <p>Any personal academic and career plans prescribed by local school boards for students in grades 7-12 that are currently in effect would be approved to continue without further action by the Board.</p>
20-131-210		Establishes the provisions for the role of the principal.	<p>Proposed language requires the principal to notify parents when a student is removed from classes for disciplinary reasons for two or more</p>

			<p>consecutive days.</p> <p>In 2007, the House Education Committee, while not taking action on HB 3201, related to removing students from classes, requested the Chairman write a letter to the Board of Education asking that the Board consider this issue in its review of applicable regulations, and report back to the patron and the committee. Language in response to this bill is included in the proposed revisions.</p> <p>Language was added to provide for guardians as well as parents. Also language was added to clarify that the school shall have met its burden if it makes a good faith effort to provide the notice.</p>
20-131-270		Establishes provisions for school and community communications.	<p>Proposed language adds the two new diplomas, Standard Technical and Advanced Technical, to the list of diplomas included in this section.</p> <p>Additional language regarding the school performance report card has been reviewed for clarity.</p>
20-131-280		Provides expectations for school accountability.	<p>Proposed language adds the graduation and completion index to existing language regarding accreditation of schools. This is necessary to align this regulation with new language in section 8 VAC 20-131-300.</p> <p>The points assigned for the certificate of completion is reduced from 60 to 25 points.</p> <p>Language is added to align proposed revisions to the Board of Education’s adopted definition of graduation rate.</p> <p>A section number is changed.</p> <p>Language is added stating that the Board may add new tests or discontinue the use of existing tests in the Virginia Assessment Program by providing adequate notice to local school boards.</p>
20-131-290		Establishes procedures for certifying school accreditation eligibility.	<p>The term “six year plan” is changed to “comprehensive plan” to align the regulatory language with changes made to the statutory language in the Standards of Quality sections in the Code of Virginia.</p>
20-131-300		Establishes procedures for application of the standards.	<p>Language is proposed to create the accreditation rating category of “Provisionally Accredited Graduation Rate.” This category is created to address the use of a graduation and completion index for the first time in the accreditation of schools.</p> <p>Obsolete language is removed.</p>

			<p>Proposed language creates a graduation and completion index to that all schools with a graduating class would be required to meet in order to be fully accredited. This amendment is necessary to address the Board of Education’s concern and the public’s concerns regarding reducing the number of students dropping out of school and increasing the number of students graduating with an appropriate credential that will enable them to transition into postsecondary instruction or the workforce.</p> <ul style="list-style-type: none"> • The graduation and completion index would include weighted percentage points for students who: <ul style="list-style-type: none"> ○ Graduate from high school in four years or less – 100 points ○ Graduate from high school in more than four years – 100 points ○ Earn a GED certificate – 75 points ○ Remain in school for more than four years – 70 points ○ Earn a certificate of completion – 25 points • The index would account for all students in the graduating class’s ninth grade cohort, plus transfers into the school and minus transfers out of the school and students who are deceased. Students who remain in school or earn a credential after their assigned cohort year would also be included in the index. • Beginning with academic year 2010-2011, for accreditation ratings for 2011-2012, schools with a graduating class would be required to achieve a minimum of 85 percentage points on the Board of Education’s graduation and completion index, in addition to meeting the required Standards of Learning pass rates, in order to be fully accredited. • A school would be rated provisionally accredited in academic years 2011-2012 through 2015-2016 if it met the required pass rates on the Standards of Learning assessments, but failed to achieve 85 percent on the graduation and completion index, but met the following benchmarks: <table border="1" data-bbox="894 1675 1427 1892"> <thead> <tr> <th colspan="3">Graduation and Completion Index Benchmarks for Provisionally Accredited Ratings</th> </tr> <tr> <th>Academic Year Index</th> <th>Accreditation Year</th> <th>Percentage Points</th> </tr> </thead> <tbody> <tr> <td>2010-2011</td> <td>2011-2012</td> <td>80</td> </tr> <tr> <td>2011-2012</td> <td>2012-2013</td> <td>81</td> </tr> </tbody> </table>	Graduation and Completion Index Benchmarks for Provisionally Accredited Ratings			Academic Year Index	Accreditation Year	Percentage Points	2010-2011	2011-2012	80	2011-2012	2012-2013	81
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2012-2013	2013-2014	82										
2013-2014	2014-2015	83										
2014-2015	2015-2016	84										
20-131-325		Establishes recognition and rewards for school and division accountability performance.	Language is added to permit school divisions to receive recognitions and rewards from the Board of Education for accountability performance. Existing language currently allows only schools to be recognized and rewarded. Language was added to name the Virginia Index of Performance (VIP) incentive program.									
20-131-360		Provides for an effective date for the regulations.	Language was added to make the provisions in 8 VAC 20-131-30 B. relating to double testing and the provisions in 8 VAC 20-131-60 C. relating to Virtual Virginia effective upon final adoption in accordance with the Administrative Process Act. The remainder of these regulations shall be effective for the 2010-2011 academic year.									

Enter any other statement here

Regulatory flexibility analysis

Please describe the agency's analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the proposed regulation.

These regulations do not impact small businesses.

Family impact

Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

Schools are important institutions in communities. The impact of the proposed regulatory action on the institution of the family will be continued improvement in the public education system to help ensure that children have the opportunity to receive a quality education and preparation for adulthood whether they move on to higher education, the military or the work force. Students must be adequately prepared for the future in order to lead productive lives. Being productive and successful will increase the potential for strong stable families.